

June 16, 2023

National Manager
Livestock Identification and Traceability Program
Canadian Food Inspection Agency
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Sent via email: cfia.trace-trace.acia@inspection.gc.ca

To Whom It May Concern;

Re: Response to the Canada Gazette, Part 1, Volume 157, Number 11: Regulations Amending the Health of Animals Regulations (Identification and Traceability)

The OFA proudly represents more than 38,000 farm businesses across the province, supporting our members and the agriculture industry on issues, legislation and regulations governed by all levels of government. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA appreciates the opportunity to provide comments on the Canada Gazette, Part I, Volume 157, Number 11: Regulations Amending the Health of Animals Regulations (Identification and Traceability). Animal diseases can lead to events such as disease outbreaks and food safety issues, and have significant effects on the livestock industry, the national herd, the economy, food security and public health. OFA recognizes the importance of livestock identification and traceability in mitigating the impact of disease outbreaks, food safety issues and natural disasters. We support modernizing and streamlining regulatory requirements to improve compliance with livestock traceability, however, OFA is concerned that several of the proposed amendments in this consultation would negatively impact the livestock sector.

Under the existing Health of Animals Regulations (HAR), not all livestock species that share diseases are regulated. OFA supports expanding traceability requirements for goats and cervids under the HAR, as they share diseases with currently regulated species. Subjecting goats and cervids to traceability requirements would address information gaps that exist between regulated and non-regulated species, reduce the risk of shared diseases between species, and allow for more robust and comprehensive disease control and surveillance activities.

OFA supports the need for movement reporting requirements for species regulated under the HAR. The current requirements for movement reporting under the HAR are inconsistent between regulated species; the proposed regulations streamline requirements and provide consistency amongst all regulated species to increase compliance. OFA understands and supports the need for an efficient response to disease outbreak and agrees that the current allowable time to report of 30 or 60 days for reporting is too long. However, we are concerned that the proposed timeframe of seven days to report is too short and recommend a longer period to report an event to increase compliance.

OFA is strongly opposed to the movement reporting requirements for fairs, exhibitions, and veterinary hospitals. The proposed changes would hold fairgrounds responsible to collect and record animal movements to and from fairgrounds within seven days to the responsible administrator. Many agricultural fairs are run by volunteers; OFA believes these changes will place significant and unnecessary burden on agricultural societies and local fair boards, who do not possess the resources (human or financial) required to collect and submit animal movement information. We are concerned that this would result in the cancellation of many livestock shows, 4-H events, and educational livestock displays. OFA supports the Ontario Association of Agricultural Societies in their belief that the burden of data collection and reporting should fall on the farm of origin and animal owner and should not fall upon agricultural societies. Additionally, OFA believes the farm of origin should also be responsible in ensuring that all animals sent to fairgrounds have approved/intact/undamaged indicators.

The proposed regulatory amendments would require commercial carriers of all regulated livestock to ensure that information accompanies a load of regulated animals or load of their carcasses being carried and would be required to keep a record of the documentation for two years. OFA believes that the proposed regulations place significant undue burden on livestock haulers or carriers to be responsible for this information and record keeping, and recommends a shorter record-keeping timeline of 6 months.

The geographical information reported for livestock premises is inadequate under the current HAR. OFA supports the proposed change to require Premises Identification Numbers (PIDs) when reporting movement of livestock to the administrator. PIDs provide important information related to sites where livestock is kept, assembled, or disposed of, and enables the rapid and accurate determination of the departure or destination points of animals.

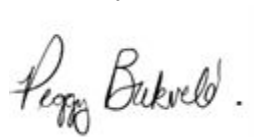
OFA supports modernizing the definition of animal indicators by replacing the word “tag” with “approved indicator” to support the development of innovation in the sector, such as new technologies and digital solutions. However, it is important that consideration is given to existing sector traceability initiatives, such as PigTRACE, to ensure that the proposed amendments to the HAR do not negatively impact the reputation and usefulness of such programs already in place.

OFA is concerned about the associated costs that would be borne by the livestock industry by the proposed regulatory amendments to the HAR. The proposal states that “the livestock industry would assume the costs associated with reading, collecting and reporting of traceability-related data and information, the purchase and application of approved animal indicators, premises

identification and learning new information obligations because of regulatory changes”. OFA recommends and supports the use of funding programs and grants to ensure compliance with these regulations and lessen the burden of costs to the livestock industry associated with the proposed amendments to the HAR.

OFA recognizes the importance of livestock traceability to mitigate the risks and impact from disease outbreaks and to protect the health of Canadians. We appreciate the opportunity to provide our feedback and agricultural perspectives on the Canada Gazette, Part I, Volume 157, Number 11: Regulations Amending the Health of Animals Regulations (Identification and Traceability).

Sincerely,



Peggy Brekveld
President

cc: OFA Board of Directors