



December 29, 2022

Michael Richardson
Food Safety and Environmental Policy Branch
1 Stone Road West
Ontario Government Building, 2nd floor, Southwest
Guelph, ON N1G 4Y2
michael.richardson@ontario.ca

Dear Michael,

Re: ERO 019-6320 Proposed amendments to the Animal Health Act, 2009 to enhance animal health preparedness and to make additional updates to the legislation

Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on *ERO 019-6320 Proposed amendments to the Animal Health Act, 2009 to enhance animal health preparedness and to make additional updates to the legislation*. BFO represents 19,000 beef farmers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development.

We believe the provincial government should be able to act in a timely and effective manner in the event of an emerging animal health emergency and support the Ministry of Agriculture, Food and Rural Affairs' proposed changes that will provide clarity to Ontario's animal health legislation. Specifically, BFO is supportive of OMAFRA's proposed changes to allow the Minister to issue a temporary response order following the advice of the Chief Veterinarian of Ontario, in situations where the Minister is of the opinion that any delay in implementing measures will or likely will result in increasing the risk to animal or human health and requires immediate measures to mitigate the possibility of that risk increasing.

In addition to our support of the proposed changes, we would also like to provide comments on the importance of support initiatives for livestock producers in the event of emergency processing disruptions or border related disruptions. BFO was pleased to see in the province's 2022 budget the \$5 million allocated for processing related emergency disruptions. We believe funding for such initiatives is extremely important for the livestock sector. The AgriRecovery Beef Emergency Feed Maintenance Initiative, better known as the beef cattle set-aside program, that was triggered by the province in December 2020 to manage cattle backlogs as a result of COVID-19 related slowdowns in Ontario's processing sector was crucial and greatly appreciated. The program provided an important mitigation tool to address the processing disruption.

We believe the beef cattle set-aside program should become a permanent component of AgriRecovery to help mitigate supply chain disruptions. Plant floods, fires, human or animal disease outbreaks, and



labour-force stoppages could be better managed with access to this program. The beef cattle set-aside program would serve as an important tool in the event that there is a surplus of livestock as a result of a border-related closure or major processing plant disruption.

On behalf of BFO, thank you for the opportunity to provide comments on the *Proposed amendments to the Animal Health Act, 2009 to enhance animal health preparedness and to make additional updates to the legislation.*

Sincerely,

A handwritten signature in dark ink, appearing to read "Jack Chaffe", with a long, sweeping underline.

Jack Chaffe
President

