

January 9, 2023

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

Submitted online and sent via email to michael.richardson@ontario.ca

*RE: ERO 019-6320 Proposed amendments to the Animal Health Act*

Dear Mr. Richardson,

Ontario is home to more than 500 egg and pullet farm families, who produce approximately 270 million dozen eggs annually from about 11 million laying hens, representing approximately 40 per cent of Canada's egg and pullet farm families. Ontario's annual egg farm production includes \$520 million farm sales value and contributes \$1.6 billion to the economy.

On behalf of Egg Farmers of Ontario's (EFO) 500 family-run farms across the province, we are writing today in support of ERO 019-6320: Proposed amendments to the *Animal Health Act, 2009*, to enhance animal health preparedness and to make additional updates to the legislation. EFO supports these proposed amendments as they are aligned with our objectives to promote animal welfare, food safety and supply chain security, while minimizing risks associated with foreign animal diseases.

During 2022, the poultry sector in Ontario and across Canada experienced a persistent outbreak of Highly Pathogenic Avian Influenza (HPAI), resulting in the loss of over 748,000 birds in Ontario alone. EFO, through the work of the Feather Board Command Centre (FBCC) and the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA), has been working closely with the Canadian Food Inspection Agency (CFIA) to respond and reduce the risk of spread of HPAI. This experience has demonstrated the importance of a rapid, collaborative response when a foreign animal disease (like HPAI) is detected.

When the first detection occurred in March 2022, Ontario's regulated feather boards quickly coordinated a provincewide response and implemented heightened biosecurity requirements to protect the health of our flocks and the supply chain. However, we had little ability to influence or regulate those areas of the sector that do not operate under supply management (i.e., backyard flocks, exhibition birds, auctions/swaps, etc.), resulting in significant risk of spread. Two weeks into the first outbreak, through the leadership of OMAFRA, a Minister's Order was implemented, preventing the commingling of birds at exhibitions and auctions, in April and then again in October.

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Under the proposed amendments to the *Animal Health Act, 2009*, a temporary response order, effective for up to 72 hours, would permit a more immediate response by OMAFRA, upon advice from the Chief Veterinarian for Ontario. Further, the opportunity to extend the temporary response order for an additional 72 hours upon the recommendation of the Chief Veterinarian for Ontario, could be utilized while a longer-term Minister's Order is developed and established, as required. This change in procedure would expediate the process and provide the necessary support to help strengthen the response and mitigate the risk of disease spread to ultimately help protect not only animal health, but the integrity of our food supply chain.

We appreciate the opportunity to provide our feedback and support on ERO 019-6320: Proposed amendments to the *Animal Health Act, 2009*.

Regards,

A handwritten signature in black ink that reads "Scott Helps". The signature is written in a cursive, slightly stylized font.

Scott Helps, Chair  
Egg Farmers of Ontario

A handwritten signature in black ink that reads "Ryan Brown". The signature is written in a cursive, slightly stylized font.

Ryan Brown, General Manager  
Egg Farmers of Ontario