



Veal Farmers of Ontario

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Ms. Sarah Fleischhauer
Food Safety and Environmental Policy
1 Stone Rd. W.
Guelph, ON N1G 4Y2

January 9, 2023

Re: Proposed changes to Tables 1 and 2 of the Nutrient Management Protocol

Dear Ms. Fleischhauer,

Veal Farmers of Ontario (VFO) is in support of increasing the weight of grain-fed veal cattle to 725 pounds, the respective increase in manure production calculations in Table 1 of the of the Nutrient Management Protocol, and the updated nutrient content values of grain-fed veal cattle manure in the reference Table 2- Manure Databank.

However, VFO would like to express concern with the second proposed changes to Table 1 of the Nutrient Management Protocol. The proposed change to the housing capacity area allocated per animal for grain-fed veal states that; "The original value of 6.97 square meters per animal would change to 5.85 square meters per animal which would align with the current Canadian Code of Practice for the Care and Handling of Veal Cattle".

In actual fact, *The Code of Practice for the Care and Handling of Veal Cattle* (The Code) is outcome based and does not list a specific space requirement for housing. Section 3.3. of The Code states that the requirements for veal cattle housed in groups are "Cattle in groups must be able to easily stand up and lie down, turn around, groom, adopt sternal and lateral resting postures, and rest on the enclosure floor at the same time". VFO staff have tried to relay this point to Ontario Ministry of Agriculture, Food and Rural Affairs previously to no avail. A copy of *The Code of Practice for the Care and Handling of Veal Cattle* can be found [here](#).

Therefore, VFO respectfully requests that the rational for the change in the housing capacity area allocated per animal for grain-fed veal be revised to remove the incorrect reference to *The Code of Practice for the Care and Handling of Veal Cattle*. VFO cannot support incorrect referencing of housing capacity allocations.

Should you have additional questions or if you would like to discuss further, please do not hesitate to contact Kendra Keels, Industry Development Director at kkeels@vealfarmers.ca. Thank you for the opportunity to comment and we look forward to hearing from you on next steps in updating this information.

Sincerely,

Jennifer Haley,
Executive Director

cc. Ryan Puviraj, Director of Policy, Office Minister Thompson, OMAFRA