

Haines Report- Farm to Fork

Comments from Ontario Cattlemen's Association - October, 2004

The Ontario Cattlemen's Association (OCA) recognizes that OMAF is, and will be, moving quickly with a number of regulations and enforcement of regulations in response to the Justice Haines report. With limited time for consultation, OCA has provided a summary of key priorities, concerns and input below.

On-Farm Food Safety

Recommendation #3 calling for mandatory HACCP-based on-farm food safety programs is well supported by OCA. However, immediate challenges in effectively implementing mandatory HACCP include adequate resources for all beef farms, membership location, and measures available to ensure compliance. It is OCA's position that any mandating of programs be accompanied with support and assistance available to all farms regardless of size.

In regards to recommendation #4, #21, #27 and #48, OCA is unclear of the role OMAF is expected to perform in terms of enforcement, program coordination and recognition, developing resource material and training of auditors, program operators, etc.

It is OCA's position that provincial regulations governing on-farm food safety programs must be compatible with national programs and previously established provincial delivery agents. The Quality Starts Here-Verified Beef Production (QSH-VBP) program delivered by OCA, is the only on-farm food safety program for beef producers in Ontario .

Again, in response to recommendation #28, OCA supports QSH-VBP as the only on-farm food safety program for all farms with beef cattle. Rather than design and develop new provincial programs for mixed farms, OCA would expect OMAF to work within the national program framework for those commodities where one has been developed. However, OCA does continue to support OMAF involvement in establishing a cross-commodity approach to delivery, administration, certification and audit services to eliminate duplication of efforts on a number of fronts.

Recommendation #30 suggests that prerequisite programs for OFFS programs be developed. All the national programs have these in place.

In summary, it is essential for the Ontario beef industry to have a fully functional, visible, effective, and pro-active food safety program. Industry in partnership with government should establish quality and food safety standards to mitigate risk from another food safety crisis such as BSE.

Traceability, Biosecurity and Animal Health

In reference to recommendation #14, the OCA membership called for mandatory registration of beef farmers in 2002. In response, OCA has partnered with other commodity groups in the development of such a system based on membership data and GIS data collection. OCA is concerned with any duplication of effort in GIS initiatives and ownership of membership data information.

OCA strongly supports recommendation #12 and #13 calling for the establishment of an Ontario meat safety traceability system. The BIO/OCA/OMAF- developed tag retirement service should continue to be supported by the provincial government as the base for such a system. Considering the value to public health, the cost of traceability should be borne by provincial and federal governments.

OCA strongly supports recommendation #17 and #19 so that we may meet and exceed our obligations under OIE and international protocols for food safety.

In response to recommendation #32, OCA is already on the record of supporting a regulation requiring a certificate for the purchase of livestock medicines in the absence of a veterinarian script. However, we disagree with this requirement if medicines are purchased through a veterinarian. Feed additives should be further defined as feed medication or medicated feed. Finally, OCA feels that regulating livestock medicines is long overdue and we eagerly await the promulgation of such a regulation with the above considerations.

Meat Inspection

Since 1989, 21 federal plants have disappeared from Canada, 9 in Ontario. The remaining three Ontario federal kill plants represent 85% of the cattle kill, however the remaining slaughter demand is met by over 190 provincial plants in the province. Provincial plants provide services that federal plants cannot such as custom slaughter. Provincial plants also tend to be local to a community reducing transportation distances and providing services in rural areas. Recognizing the loss of export markets following May 20, 2003 border closures, OCA strongly supports provincial and federal assistance for increased slaughter capacity.

In reference to recommendation #3, OCA is concerned that mandatory HACCP for non-federally registered plants and other new requirements (recommendation #44) without appropriate resource support and a phase-in period will dramatically reduce availability of kill capacity at a time when we need increases in the province. Perception rather than science appears to be driving the one system approach to HACCP at the abattoir level.

On-farm Slaughter, Animal Welfare, Handling, Transport

Recommendation #34 is unclear and does not address OCA's concern that there is a double standard between the processing of un-inspected game and on-farm slaughtered livestock. OCA is on the record as opposing the recent change to the Health Protection and Promotion Act requiring inspection of on-farm of slaughtered cattle destined for processing at a local plant. The regulations ignore the practicalities of life in many areas of rural Ontario.

OCA does not support recommendation #35. Additional time requirements and cost to meet provincial standards is impractical in situations where local sales are favoured by regional consumers.

OCA requests clarification and status of recommendation #48.

As part of the BSE Recovery Program-Cull Animal Advisory Committee, OCA recently responded to recommendation #42 with the purchase of 38 captive bolt pistols for the OSPCA for use by veterinarians at sales barns.

In response to recommendation #57, OCA supports our current Ontario system for transporting non-ambulatory animals.

Recommendation #33 and like recommendations that call for training for farmers with regard to non-ambulatory animals, humane euthanasia, and on-farm disposal of livestock and poultry mortalities may be logistically challenging. OMAF Fact Sheets and information in the agricultural press on these issues may reach a wider audience than training sessions. OCA is not convinced that for all areas of the province on-farm disposal will be preferred over a functioning deadstock collection system. In addition, deadstock collection depots serve as a central collection point for BSE testing. As part of the BSE Recovery Program- Cull Animal Advisory Committee, OCA recently supported an Ontario Farm Animal Council proposal to revise and re-print fact sheets for farm circulation through a number of means including OMAF and OSPCA.

OCA is not clear on recommendation #38 which calls for harmonization with Alberta's Livestock Transportation Regulation. It is our understanding that the Alberta regulation is currently under review by industry groups including the Alberta Farm Animal Council.

Deadstock

OCA requests the status of OMAF's response to recommendation #79 on providing on-going financial support to deadstock collectors to ensure collection continues into the future. We are concerned that short-term solutions although needed don't address the larger issue of managing the collection and disposal of deadstock in this province. OCA calls for a joint government-industry effort in developing and supporting long-term innovative solutions that offer more than a band-aid fix.

OCA does not support recommendation #80 which calls for termination of the pilot project in eastern Ontario which allowed producer transport of deadstock. The letter dated August 18, 2004 to the Honourable Steve Peters outlines OCA's position.

OCA supports recommendation #81 calling for OMAF to work with CFIA to develop a mass carcass disposal strategy in the event of a foreign animal disease. The Canadian Animal Health Coalition has already begun work on this type of initiative and should be part of the process.

Final Comments

Our comments within this document have been vetted through a simple checklist of what we consider achievable with assistance and enforceable where applicable. OCA does not support any mandatory programming without full assistance for beef farm operators, however as an industry we are prepared to make necessary change to mitigate against future food safety crisis.

In closing we support recommendation #112 calling for an independent audit following one year of report implementation. However, we anticipate that all changes to our current regulatory system will only follow a consultation phase with industry group representatives. Similarly we would expect to work with government on any communications materials, assistance programs, producer training and new infrastructure development.