

OSF Commentary on the Proposed changes to Health of Animals Regulations on ID & Traceability

April 24, 2023

Today:

- The requirements (of the current regulations) for livestock owners who have more than one species are inconsistent, resulting in a greater likelihood of non-compliance. The proposed regulations would be the same for ALL regulated species.
- For example(outside of Quebec):
 - Reporting requirements for a sheep producer are 7 days for some and 30 days for others.
 - For pigs all reporting requirements are 7 days
 - For cattle reporting requirements range from 7 to 60 days

Proposed Changes:

- The requirement for on-farm record-keeping would be repealed
- Under the proposed regulations – reporting requirements fall on the destination site, meaning that producers would no longer have to report deadstock that go off-site for disposal. This would become a requirement of the “receiving” site.
- Several of the flock management software programs have built-in reporting to CCIA (EweManage, AgSights)
- For those producers not using these software programs, reporting can be done through the website <https://www.clts.canadaid.ca/CLTS/secure/user/home.do> or using the CLTS MOBO app <https://support.canadaid.ca/clts-mobo/get-clts-mobo/>
- A huge burden is being placed on the transporters. They are tasked with the responsibility of not only providing the “receiver / destination” with all relevant movement information, but also having to keep those records for 2 years
- Goats and cervids will finally become regulated species.

What’s new for Sheep:

- **Premises ID** will be required, and reported with tag purchases, animal movements, and must be kept current.
- **Transporting Sheep or their Carcasses** The operator of a conveyance would be required to have a manifest document with the following information and to provide that information to the operator of the destination site, within 24 hrs after arrival:
 - the premises identification number of the departure site;
 - the premises identification number of the destination site;
 - the number of animals or carcasses being moved;
 - the date and time the animals or their carcasses left the departure site ; and
 - the licence plate number or conveyance identification.
 - The operator of the conveyance would be required to keep a record of this information for 2 years.
- **Export of sheep** It would be required to **report** the export of sheep within 7 days:
 - the premises identification number of all the sites where the animals were loaded and the number of animals loaded at each of those sites;

- the dates the animals were loaded and the number of animals loaded on each of those dates;
- the identification number on the approved indicators;
- the location(s) to which the animals are being exported; and
- the licence plate number or conveyance identification.
- **Import of sheep** It would be required to identify sheep with an approved indicator at the first site at which they are unloaded after import.
 - It would be prohibited to provide an approved indicator to another person for the purpose of identifying sheep that are located in a foreign country.
 - An exemption for sheep bearing a foreign tag deemed equivalent to a Canadian approved tag, which do not need to be re identified (in current regs)
 - An exemption for sheep imported for immediate slaughter, which do not need to be identified with an approved tag (in current regs)
 - It would be required to **report** the import of sheep or its carcass within 7 days:
 - the location(s) from which the animals or carcasses were imported;
 - the premises identification number of your site;
 - the date the animals or carcasses arrived at your site;
 - the identification number on the approved indicators or equivalent foreign indicators; and
 - the licence plate number or conveyance identification
 - The exemption to the reporting requirements for sheep imported for immediate slaughter would be repealed
- **Notable Prohibitions** It is prohibited to:
 - Remove or cause the removal of sheep or its carcass from a site unless it bears an approved indicator (with the exceptions listed in the “Identification of sheep” section).
 - Apply an approved indicator to sheep or the carcass of sheep that are not at the site for which the indicator was assigned.
 - Apply an indicator approved for a species to an animal or the carcass of an animal of a different species.
 - Transfer an approved indicator from an animal or its carcass to another animal or its carcass, or reuse an approved indicator
 - Apply, make, sell, or provide a means of identifying animals or animal carcasses that is likely to be mistaken for an approved indicator.
 - Remove* an approved or revoked indicator from sheep or its carcass, except at the time and place of disposal of the carcass.
 - Alter an approved indicator in any manner.
 - Give, sell or distribute approved indicators assigned for your site. (NEW)

There are additional requirements for transporters, livestock site, abattoirs that are not addressed in this summary. They can be found on the consultation site –

<https://inspection.canada.ca/about-cfia/transparency/consultations-and-engagement/identification-and-traceability/eng/1672954519322/1672954519869#webinar1>

The traceability consultation website is here: [Canada Gazette, Part 1, Volume 157, Number 11: Regulations Amending the Health of Animals Regulations \(Identification and Traceability\)](#)

Comments are organized by sections (Issues, Objective, Description, Regulatory Analysis). OSF has only commented on the “Description” section of the document.

Description

1. In this section, there are references to requirements for deadstock to be identified with an approved indicator if moved to another site. The mortality rate in newborn lambs in Canada over the last 30 years is 12-16%, globally the number is 10-30%. Ontario Sheep Farmers does not believe there is a rationale for putting a costly tag in these small carcasses where the likelihood of a reportable disease being the cause of death is unlikely and the carcasses are being rendered or going to a biomass plant.

Information on lamb mortality in Ontario can be found here: [Understanding lamb mortality | ontario.ca](#). Note that infectious disease is not in the top 5 reasons for lamb mortality according to global research data.

2. Ontario Sheep Farmers requests a change in terminology when referencing deadstock to replace the word “carcass” with “deadstock carcass” or other terminology. Consumers equate carcass as that portion of the animal that is used for human consumption. Using carcass to refer to deadstock can cause confusion and perhaps loss of confidence in and questioning adherence to Canadian Food safety regulations.
3. The responsibilities for livestock haulers (carriers) require commercial carriers for regulated livestock to “ensure that information accompanies a load of regulated animals or load of their carcasses being transported”.

Ontario Sheep Farmers is concerned with the significant burden to be carried by transporters/conveyors in the traceability chain. The National Farm Animal Care Council recently announced they will not be continuing their work on a National Code of Conduct for livestock transport as there is not a national transportation organization in Canada. Without a national organization representing the interests and regulation of livestock transportation, this will be a weak link in the traceability chain.

At minimum, funding should be provided to offset the cost of readers, printers, manifests for transporters. However, it is important that the livestock transporters have a national voice and input into this process.

4. Under the regulations, there is no provision for the return of approved indicators to the responsible administrator. Ontario Sheep Farmers recommends a return system that allows a producer to submit all remaining tags to the responsible administrator for a refund so that they can be re-issued within the system. This would only apply in instances where a producer is exiting livestock farming and where the packaging is unopen.

Additionally, there should be a provision to transfer a producer's inventory of approved indicators to a new site in the case where a producer moves to a new location with a new premises ID.

5. Ontario Sheep Farmers supports the position of the Ontario Association of Agricultural Societies (OASS) in their request for the reporting of movement to and from fairgrounds be the responsibility of the farm of origin (owner of animal) as the animals do not leave the farmer's responsibility for care on the fair site. The burden of collecting and reporting this information should not fall upon our agricultural societies.

Many agricultural societies have indicated that the lack of volunteer resources may ultimately result in the cancellation of many if not all, of their livestock shows, 4-H livestock programs and educational animal displays at their fairs if the proposed changes become law.

These proposed changes could also result in fairgrounds not being available for any livestock programs not directly affiliated with the fair e.g., livestock shows, fitting and showing days, judging schools, etc.