



September 19, 2022

David Svab, Director  
Animal Feed Program  
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**Re: Consultations on Registration Requirements for Gut Modifiers**

Dear Mr. Svab,

On behalf of the National Cattle Feeders' Association (NCFA) and the Canadian Cattle Association (CCA), please accept this input and comments regarding the CFIA consultation on registration requirements for gut modifiers.

NCFA and CCA welcomes the opportunity to comment on this increasingly critical component of the animal feed regulatory system in Canada. A consistent supply of feed and associated feed ingredients is essential to the well-being of the Canadian beef industry. We strongly support innovation in feeds including the many advantages that gut modifiers have for cattle health and the reduction of greenhouse gas emissions from enteric fermentation. We also strongly support the work CFIA does to ensure that both animal health and consumer safety is protected through the feed approval system.

It is recognized that the current consultation is technical in nature regarding registration application requirements and procedures. It is largely directed at companies who will be submitting applications for approval of gut modifier products. However, NCFA and CCA have a strong interest and consider this process critical to the livestock industry. The system must ensure that the approval process is effective and technically sound but is also conducted in a timely manner.

NCFA and CCA support the recent federal government decision to have most gut modifiers fall under the responsibility CFIA Animal Feed Program. We hope that this results in more timely approval of much needed feed ingredients. We also welcome the inclusion of "odour and methane" controls as recognized outcomes for some gut modifiers. With the Government of Canada GHG reduction priorities and targets for the agricultural sector, and public opinion concerned with impacts cattle have on GHG levels, we are keenly interested in seeing early approval of gut modifiers that reduce methane emissions. For the cattle industry, this area is the one of greatest immediate concern, as we attempt to find ways to do our part to meet GHG reduction targets.

NCFA and CCA encourage CFIA to reference reviews by feed regulatory bodies in other countries as a key input in registration approval. Also, we call for a reconsideration of some requirements that seem to be unnecessary and overly onerous. An example of this would be the proposed requirement for three studies to support gut modifier claims, when one study should be sufficient.

A major concern is that the CFIA Feed Program has a long track record of very slow approvals of feeds, additives, and ingredients. Even if with a streamlined gut modifier approval process, the ongoing delays, in excess of 2 years, will continue. This is unacceptable and must be addressed aggressively by the CFIA. We are encouraged to hear that CFIA has introduced an action plan to address the situation, but we are gravely concerned that these steps will not adequately address the problem. We can no longer continue to see innovation stymied, and needed benefits go unrealized at a great cost to producers and all Canadians.

We trust that our comments on this important initiative are duly considered at the technical and senior management levels of the CFIA. NCFA and CCA welcome continued dialogue on this and other areas of CFIA jurisdiction impacting the livestock industry. We look forward to continued collaboration.

Sincerely,



Janice Tranbeg  
President and CEO  
National Cattle Feeders' Association



Larry Thomas  
Manager, Environment and Sustainability  
Canadian Cattle Association

CC: Dr. Mary Jane Ireland, Chief Veterinary Officer  
Dr. Siddikha Mattani, CFIA President