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February 10, 2023

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RE: Review of Pan-Canadian Action Plan on Antimicrobial Resistance

Dear Dr. Ireland,

Thank you for the opportunity to provide feedback on the Pan-Canadian Action Plan on Antimicrobial Resistance, we appreciate the request and consideration for our input.

The cattle feeding sector in Canada understands the need for an action plan on antimicrobial resistance and have been actively engaged in AMU/AMR monitoring and industry awareness on that front. The National Cattle Feeders' Association (NCFA), in collaboration with the Alberta Cattle Feeders' Association (ACFA), have been spearheading the following efforts:

- Initiated a National Feedlot AMU/AMR Surveillance Program to comprehensively track the use of antimicrobials and antimicrobial resistance in pathogens for bovine respiratory disease as well as enteric bacteria of concern to public health. The program is currently in its fourth year and funding of over \$1.3M has been secured through grants and industry commitment, working in collaboration with CIPARS and other stakeholders.
- The National Feedlot AMU/AMR Surveillance Program communication team have been developing extension materials (attached) for veterinarians and producers and will continue to provide information and resources. Currently they are building a website as a public outface for information. The focus is to share results of the surveillance program and promote antimicrobial stewardship.
- NCFA is a member of Animal Health Canada (AHC) and Canadian Animal Health Surveillance System (CAHSS). We encourage and support research to reduce AMU including the development of effective vaccines, improved diagnostics, natural products, and improved best management practices.

In regard to the proposed Pan-Canadian Action Plan on AMR:

- In the presentation overview of why AMU matters in agriculture and agri-food (slide 4), we would express caution over sharing the statistics showing AMU distribution by sector in such a simplified format. The indication that 82% of antimicrobials sold in 2020 were for production animals does not capture the fact that the majority of those antimicrobials are of very low importance related to AMR in human medicine; if these facts are being presented to other groups, we encourage that additional context be provided with these statistics.
- In the PCAP working document, we appreciate that the plan highlights economic impacts of AMU/AMR and the human health implications of AMR; however, we would also urge priority consideration of the impacts of AMR on animal welfare.

The Canadian cattle feeding industry respects the important role we play in the judicious use of antimicrobials and are committed to constant improvement in this area. Livestock production depends on the availability of effective antimicrobial options to maintain animal care standards and we strive for prudent use of these products. We appreciate the industry consultation and collaboration, please do not hesitate to reach out if you require further clarification on our feedback.

Sincerely



Janice Tranberg
President & CEO