



#6, 11010 - 46th Street SE
Calgary, AB T2C 1G4
Tel 403-769-1519
Fax 403-209-3255

March 9, 2023

Animal Feed Program (AFP)
Canadian Food Inspection Agency
59 Camelot Drive
Ottawa, Ontario K1A 0Y9

Email: cfia.afp-paa.acia@inspection.gc.ca

Re: Use of foreign decisions for livestock feed approvals in Canada

To: CFIA Feed Program

The National Cattle Feeders' Association (NCFA) was established in 2007 to serve as a unified voice for Canada's cattle feeders on issues of national importance and industry relevance. On behalf of our membership, we appreciate the opportunity to provide feedback on the proposed pathway for the use of foreign decisions for livestock feed approvals in Canada.

NCFA fully supports developing a process for foreign decisions to be considered for livestock feed approvals in Canada. In comparison to global markets, the overall volume of Canada's livestock industry is small, reducing the potential return on investment for companies contemplating a lengthy approval process. As a result, Canadian livestock producers are not able to access products available to their global competitors. NCFA supports the inclusion of both the EU and US as recognized approval processes, but would encourage other jurisdictions to be considered as well.

This proposed approach has the potential to reduce red tape, expenses and timelines for companies seeking approval of products and provide a competitive advantage to Canadian farmers seeking access to these products. Timely approval of these products can also move forward Canadian environmental goals. For example, there are some methane emissions reduction feed products approved for beef cattle in other countries which are not yet approved in Canada; without a recognized pathway for foreign approvals, these products may not be available to Canadian producers for several years.

NCFA urges that viable microbials be included in this proposed approval pathway. Our industry aims for constant improvement in judicious antimicrobial usage, and viable microbial products can play a significant role in achieving animal health outcomes and even larger-scope, 'One Health' outcomes, by reducing the requirement for antimicrobials.

NCFA welcomes clarification on the modification of feed approvals being grandfathered into the initial approval. For example, if there are changes in the original country of approval (e.g., species or direction of use), we would hope that the new approvals could also be accepted via the foreign decision pathway rather than requiring a regular feed premarket application process.

Lastly, we would appreciate an outline of the anticipated timelines for this approval pathway (e.g., from date an application is submitted to product being approved), as the reduction in time to market for new products would be one of the greatest benefits for our industry.

Thank you again for the opportunity to provide input on this consultation, we are encouraged by the potential in this proposed pathway. Please do not hesitate to contact us if you require further clarification on any of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melissa Downing', with a stylized flourish at the end.

Melissa Downing, PAg
Director, Regulatory and Sustainability