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December 15, 2023

Re: Description for proposed new livestock feed ingredient – 3-Nitrooxypropanol (3-NOP)

The National Cattle Feeders' Association (NCFA) welcomes the opportunity to provide comments on CFIA's consultation regarding the description of the new livestock feed ingredient 3-Nitrooxypropanol (3-NOP). Our organization represents the beef cattle feeding sector, which is expected to be a primary user of 3-NOP. This product presents a groundbreaking opportunity in mitigating methane emissions, offering a promising avenue to significantly reduce the environmental impact associated with cattle feeding.

We have reviewed the product description for 3-NOP and believe the description accurately represents the product and its intended use. We recognize the limitations of the data assessed by CFIA but do feel there is an opportunity for clarification around the restriction regarding not feeding this product to male ruminants. Examples of wording could be *"Do not feed to male ruminants intended for breeding, as sufficient testing has not been evaluated on this category of livestock."* or *"This product has not been evaluated for usage in male ruminants intended for breeding and is therefore not approved for use in those animals."*

This compound not only aligns with our collective commitment to environmental stewardship but also addresses the pressing need for practical, scalable strategies to curb greenhouse gas emissions in our industry. NCFA appreciates the engagement of industry stakeholders and anticipates the final approval of 3-NOP.

Sincerely,

Melissa Downing, PAg
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