



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

May 6, 2024

Honourable Dominic LeBlanc  
Minister of Public Safety and Intergovernmental Affairs  
80 Wellington Street  
Ottawa, Ontario, K1A 0A3

Honourable Seamus O'Regan  
Minister of Labour  
229 Wellington Street  
Ottawa, Ontario, K1A 0A6

Dear Ministers,

On behalf of the National Cattle Feeders' Association (NCFA), I am writing to express our concerns with the implementation process for *Bill S-211 - Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

By way of background, NCFA is the voice of Canada's cattle feeders. We work to improve the growth, sustainability, and competitiveness of the beef sector in Canada so as to provide a safe, high quality and accessible beef supply to Canadians and the world.

Our members are fully committed to the objective of eradicating labour exploitation from global supply chains. However, national and global solutions to this issue are complex and multi-faceted. We are uncertain that *Bill S-211* will deliver meaningful progress toward this objective.

In addition, there has been profound shortcomings in the government's efforts to ensure farm businesses are aware of the reporting requirements. Many of our members own large operations and thus meet *S-211* reporting criteria. Yet, these family-owned farms are just now becoming aware of this requirement.

Canadian businesses are faced with an unreasonable timeline to understand the requirements and undertake the necessary work to complete meaningful reports. Many of our members have sought clarity on reporting, but answers from the government have come slowly or not at all - thus creating an amplified time pressure. The result is family farm businesses incurring costs of up to \$25,000 for third-party experts to assist on the reporting requirements.

We understand the May 31<sup>st</sup> deadline is embedded in legislation and thus cannot be extended. Therefore, we expect the government to follow through on its commitment to focus this first year on supporting businesses versus implementing penalties.

As noted earlier, NCFA supports initiatives to eradicate labour exploitation from global supply chains. However, it is essential that the development of corresponding regulations for *S-211* or new legislation on this issue include an extensive consultation by government with stakeholders - including the agriculture sector. This will ensure objectives are met without unintended consequences including unnecessary administrative burdens or misalignment with other global efforts.

We appreciate if your careful consideration of our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Will Lowe". The signature is fluid and cursive, with the first name "Will" and last name "Lowe" clearly distinguishable.

Will Lowe  
Chair

c.c. Honourable Lawrence MacAulay