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On behalf of the National Cattle Feeders' Association (NCFA), thank you for the opportunity to provide input into the federal government's consultation on 'Right to Repair' policy.

NCFA works to improve the growth, sustainability, and competitiveness of the beef sector in Canada – an industry that contributes \$21.8 billion to national GDP annually and accounts for 347,000 jobs, each one of which supports another 3.9 jobs elsewhere in the economy.

NCFA represents cattle farmers who bring calves around 6-12 months old onto their farms (feedlots) and adapt the cattle's diet to a high-energy ration targeted at weight gain. Once the cattle reach approximately 1,400 pounds, they leave the feedlot to be processed into beef. Canadian feedlots vary in size from 1,000 to 30,000+ animals.

Feedlot operators use a range of high-tech electronics and equipment on a day-to-day basis to optimize the sustainability of the farm, health of the animals and competitiveness of the business. For animal care this can include automated feeding equipment, radio frequency animal identification systems and computer programs that precisely monitor feed rations and animal health. In addition, cattle feeders utilize agricultural and industrial scale equipment for crop production, farm maintenance and manure management.

Given the size and sophistication of feedlot operations, electronics and equipment must be reliable, efficient and affordable. As such, NCFA has an interest in all three elements of the government's 'Right to Repair' consultations – repairability, interoperability and durability.

Repairability is of particular concern due to the heavy equipment used on farms. Cattle feeders want flexibility on both the timing and costs associated to equipment repairs. Currently, farmers are usually reliant on the equipment manufacturer for software to diagnose the problem as well as the parts required to repair. Farmers are also often required to have the repairs done by the manufacturer's technicians. This creates an uncompetitive scenario where farmers must accept both the costs and the repair schedule of the manufacturers. Farmers would like the option to use the mechanic of their choice and thus have more control over price and timing of the repair while supporting their local economy. NCFA encourages the government to mandate equipment manufacturers to grant more access to diagnostic tools/equipment parts and flexibility in repair options.

Inoperability is important given the high-tech nature of feedlots in Canada. Systems and software continuously interact to monitor each individual animal's movement, feed intake, weight and health. This includes mixing and distributing feed rations and administering medication to animals as needed. Systems on feedlots need to be highly integrated to ensure animal health, farm sustainability and business growth. To achieve high on-farm productivity, NCFA encourages the government to mandate manufacturers to create software and systems that integrate with other brands used on the farm.

Overall affordability for farmers is a challenge, including skyrocketing costs for fertilizer, feed, seed, machinery, tools and fuel. Increased regulatory costs and taxation exacerbate this scenario. The majority of these costs cannot be passed down the value chain, making farming in Canada increasingly less profitable. 'Right to Repair' policy presents an opportunity for government to reduce on-farm costs through mandating manufacturer accountability for the **durability** of the electronics and equipment farmers purchase. This ranges from heavy equipment to ear tag readers to computer software.

Thank you for this opportunity to provide input into this broad consultation on 'Right to Repair' policy. NCFA looks forward to being part of the upcoming roundtable to further discuss the unique elements of repairability, inoperability and durability in the context of the agriculture sector.

Sincerely,



Janice Tranberg
President and CEO