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Submission to the Horizontal Red Tape Review

On behalf of the National Cattle Feeders' Association (NCFA), we appreciate the opportunity to provide input to the Government of Canada's Horizontal Red Tape Review.

NCFA is the national voice of cattle feeders across Canada and works to advance the growth, sustainability, and global competitiveness of the Canadian beef sector. Canada's beef industry contributes \$14.5 billion in annual farm cash receipts, \$34.2 billion to national GDP, and supports 347,000 jobs, each of which supports an additional 3.9 jobs elsewhere in the economy.

The Canadian and United States beef industries operate within a deeply integrated North American market. The United States is the primary destination for Canadian live cattle exports and the principal source of Canadian live cattle imports. While integrated, the sector is highly competitive, and regulatory inefficiencies or misalignment create structural disadvantages for Canadian producers.

We respectfully submit the following recommendations aligned with the five key objectives identified in the Horizontal Review.

Consultative Theme - Supporting Regulatory Efficiency for Project Reviews

NCFA Calls for Prioritization of Reliable Transportation Corridors

Departments: Transport Canada, Infrastructure Canada, Employment and Social Development Canada

A reliable and efficient national transportation supply chain is critical to the One Canadian economy. The supply chain for agriculture and agri-food must be part of the government's major project portfolio.

The Canadian beef sector is dependent on reliable access to markets both for bringing in inputs, such as grains and fertilizers, and for exporting goods such as live cattle and boxed beef. Efficient regulatory systems and major project approvals are essential to ensure that the Canadian beef industry has the ability to consistently move products across Canada, as well as to our trade partners.

Recent years have presented unprecedented challenges to the accessibility of farm inputs due to rail and port labour disputes as well as roads and bridges that are unable to withstand extreme weather.

To be a trusted supplier of agriculture products to both our national and international customers, farmers need reliable rail and port services. Labour strikes in recent years have eroded confidence in Canada as a consistent export supplier and has put at risk the welfare of animals who rely on the timely delivery of feed.

In addition, there is a significant gap when it comes to the rural roads and bridges required to move agriculture products from the farm-gate to these national corridors.

Small rural communities do not have the tax-base to appropriately build and maintain roads and bridges that are so critical for the agriculture sector and the movement of our food in Canada. Some rural communities have implemented 'livestock head taxes' to address the shortfall. This is not the path to rural economic growth as it puts our farmers at a competitive disadvantage.

Recommendations:

- Recognize a reliable national transportation supply chain as a critical nation-building project and invest not only in national corridors, but also in the roads and bridges that take agriculture products from the farm-gate to national corridors.
- Deem rail and port service in Canada as essential services in order to prevent the profound economic impact of labour strife.

Impacts:

- Increased competitiveness due to reliable supply chain to global customers.
- Opportunity for growth with closing of infrastructure gap.

Consultative Theme - Getting Products to Market Faster

NCFA Calls for Timely Approval of Innovative Agriculture Products

Departments: Canadian Food Inspection Agency; Veterinary Drugs Directorate (Health Canada); Pest Management Regulatory Agency (Health Canada)

Canada's regulatory approval system for agricultural innovations can take years in what is a cumbersome system that duplicates efforts across departments and across global jurisdictions. This red tape is delaying access to innovation for Canadian agriculture including veterinary products, feed additives, and crop protection products which help maintain animal health and livestock feed requirements.

Veterinary products, feed additives, and crop protection products already approved in trusted jurisdictions can take years to receive Canadian approval due to duplicative reviews and limited-service capacity. This delays access to tools that improve animal health, productivity, and sustainability. NCFA is currently reviewing Health Canada's Order Providing for Reliance on Decisions of, or Documents Produced by, Foreign Regulatory Authorities in Respect of Certain Drugs. This Order may address some of the recommendations below.

Recommendations:

- Implement provisional approvals for products already authorized in two or more trusted global jurisdictions.
- Adopt greater reliance on scientific assessments conducted by equivalent regulatory partners.
- Extend product registration renewal cycles for low-risk products.

Impacts:

- Faster access to innovation for the agriculture sector.
- Reduced duplication of scientific assessments thus reduction in required government resources.
- Improved productivity, sustainability and competitiveness for the agriculture sector.

Consultative Theme - Reducing Barriers to Business Productivity

NCFA Calls for Specified Risk Material (SRM) Regulatory Alignment

Departments: Canadian Food Inspection Agency; Agriculture and Agri-Food Canada

Although Canada holds negligible risk status for bovine spongiform encephalopathy, its SRM removal requirements remain significantly more stringent than those of the United States. This misalignment adds approximately \$24.2 million annually in processing costs and impacts consumer pricing. The increased attention this issue has been given by the federal government in recent months is appreciated, but ongoing and timely efforts are required to get this obstacle across the finish line to regulatory success.

Recommendations:

- Expedite regulatory amendments to align Canada's SRM requirements with United States standards.
- Establish predictable timelines for regulatory amendments affecting processing facilities.

Impacts:

- Greater certainty for capital investment in processing infrastructure.
- Reduced production costs for agriculture sector.
- Enhanced competitiveness of Canadian beef processors within the integrated North American market.

NCFA Calls for Modernization of the Restricted Feeder Cattle Program

Department: Canadian Food Inspection Agency

While the Restricted Feeder Cattle Program provides market access options, its rigid entry and exit provisions limit feedlots' ability to adapt to market volatility, trade uncertainty, or labour disruptions at processing facilities. The program has not evolved to reflect advancements in testing, traceability, and digital recordkeeping.

Recommendations:

- Introduce practical, timely exit mechanisms supported by modern testing and traceability technologies.
- Permit controlled cattle movements between feedlots or rest stations in extenuating circumstances.
- Review reporting and inspection requirements to ensure they are risk-based and proportionate.

Impacts:

- Reduced administrative burden on agriculture sector.
- Increased operational flexibility for agriculture sector.
- Improved sector resilience during market or infrastructure disruptions.

Consultative Theme - Supporting International Trade and Greater Efficiency at the Border

NCFA Calls for Border Inspection of Livestock Efficiencies

Departments: Canadian Food Inspection Agency; Canada Border Services Agency

Border inefficiencies and duplicative inspections increase costs, delay shipments, and strain animal welfare without enhancing safety outcomes. Livestock moving between Canada and the United States are inspected at origin by a United States Department of Agriculture (USDA) or Canadian Food Inspection Agency (CFIA) veterinarian, inspected again at destination, and further inspected at the border. Given mutual recognition of inspection systems, this duplication is unnecessary.

Reduced hours and limited availability of certified veterinarians at border crossings have also created backlogs, increasing costs and creating compliance challenges with driver hours-of-service regulations.

Recommendations:

- Accept USDA-certified health certificates and sealed truck verification at the border.
- Shift identification verification to destination rather than duplicating inspections at the port of entry.
- Expand service hours and establish clear service standards at livestock border crossings.

Impacts:

- Reduced resource requirements to Canadian government.
- Improved animal welfare and supply chain efficiency.
- Strengthened Canada–United States trade integration.

Consultative Theme - Enhancing Regulatory Service Delivery

Departments: All

Across all areas identified above, an overarching issue is the need for predictable, transparent, and timely regulatory service. Producers and processors require clear service standards, defined timelines, and consistent communication when navigating regulatory approvals, inspections, and program requirements. Delays and uncertainty reduce investment confidence and increase costs.

Recommendations:

- Establish and publish service standards for product approvals, inspections, and regulatory amendments.
- Ensure adequate government resourcing to meet service commitments.
- Increase transparency around application status and review timelines.
- Reduce duplicative data collection across departments through improved information sharing.

Impacts

- A business enabling environment that supports growth and competitiveness across all sectors.
- Overall reduced requirements of government resources on duplicative, unnecessary and inefficient processes.

Conclusion

Canada’s beef sector is an export-dependent, innovation-driven industry operating within an integrated North American marketplace. Regulatory modernization presents a significant opportunity to strengthen productivity, accelerate innovation, improve border efficiency, and enhance Canada’s global competitiveness—all while maintaining Canada’s strong food safety and animal health standards.

NCFA appreciates the opportunity to contribute to this important review and looks forward to continued engagement in building a more efficient, predictable, and growth-oriented regulatory system.