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March 12, 2026

Veterinary Drugs Directorate
Health Products and Food Branch, Health Canada
Emailed to: vdd.HSD-DIH.dmv@hc-sc.gc.ca

Consultation: Order Providing for Reliance on Decisions of, or Documents Produced by, Foreign Regulatory Authorities in Respect of Certain Drugs

Dear HC-VDD,

On behalf of the National Cattle Feeders' Association (NCFA), thank you for the opportunity to provide comments on the proposed **Order Providing for Reliance on Decisions of, or Documents Produced by, Foreign Regulatory Authorities in Respect of Certain Drugs**. NCFA represents cattle feeders across Canada and advocates for policies that support animal health and welfare, food safety, and the long-term sustainability of the Canadian beef sector.

Canadian feedlot operators prioritize the health of their animals, but can be limited by access to veterinary products, particularly new and emerging products which offer solutions to animal health challenges. New products have historically faced lengthy and cumbersome approval processes before being accessible in Canada, putting our sector at a disadvantage to competitors in other countries. Given the limited population of cattle combined with our arduous approval system, companies do not prioritize veterinary product approvals in the Canadian market.

NCFA strongly supports the implementation of a reliance pathway as a practical solution toward improving timely access to veterinary medicines. We also support maintaining the role of the Veterinary Drugs Directorate in conducting Canadian evaluations of maximum residue limits and product labelling, including the determination of withdrawal periods. Should the reliance model demonstrate success, it would be beneficial to explore extending a similar approach to veterinary biologics and products regulated by the Pest Management Regulatory Agency.

NCFA is encouraged by this ministerial order, and we welcome further engagement to help implement changes that support a sustainable and competitive beef sector with a focus on supporting animal care and food safety outcomes.

Sincerely,

Melissa Downing, PAg
Director, Regulatory and Sustainability
National Cattle Feeders' Association