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Re: Consultation on Canada Gazette, Part I, Volume 160, Number 26 – Regulations Amending the Safe Food for Canadians Regulations (Unmet Slaughter Capacity)

[Canada Gazette, Part 1, Volume 160, Number 26: Regulations Amending the Safe Food for Canadians Regulations \(Unmet Slaughter Capacity\)](#)

The National Cattle Feeders' Association (NCFA) appreciates the opportunity to provide comments on the Government of Canada's consultation regarding the proposed Regulations Amending the Safe Food for Canadians Regulations (Unmet Slaughter Capacity), published in Canada Gazette, Part I, Volume 160, Number 26.

NCFA is the voice of Canada's cattle feeders and works to improve the growth, sustainability, and competitiveness of cattle production across Canada. Canada's beef industry contributes \$9.7 billion in farm cash receipts annually, 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.

Our association consistently supports efforts to strengthen Canada's livestock processing sector while maintaining the integrity of Canada's food safety system and international market access. NCFA's position on Bill C-5, the *Free Trade and Labour Mobility in Canada Act* identified several foundational principles that remain relevant to this consultation.

Canada's federal meat inspection standards have been recognized and accepted by our international trading partners. Maintaining this confidence is essential to preserving Canada's export markets. Likewise, imported meat products must continue to meet Canada's federal standards. Any regulatory changes that facilitate interprovincial trade must not create circumstances where Canada's trading partners could question the integrity of our federal inspection system or seek access to the Canadian market based on lower provincial standards.

NCFA previously recommended that, where appropriate, the federal government consider providing financial assistance to provincially licensed establishments that voluntarily wish to transition to federal licensing. Such support should remain voluntary rather than mandatory, as provincially licensed facilities continue to play an important role in providing regional processing capacity and market access for cattle producers.

With respect to the current proposed *Regulations Amending the Safe Food for Canadians Regulations (Unmet Slaughter Capacity)*, NCFA believes the following principles are fundamental and must be maintained:

1. Canada's export market access must not be jeopardized.
2. Countries exporting meat products to Canada must continue to meet Canada's federal inspection standards.
3. Canada's food safety standards must not be weakened or negatively impacted.

Provided these three principles are fully protected, the proposed exemption has the potential to provide flexibility in addressing regional slaughter capacity constraints.

While NCFA recognizes the government's objective of addressing unmet slaughter capacity, we are concerned that the proposed regulatory approach may create unnecessary regulatory complexity for what appears to be a relatively limited issue.

As approximately 95 percent of Canada's meat production is processed in federally licensed establishments, the proposed regulations are only intended to address a very small segment of the industry. Given this limited scope, NCFA questions whether the proposed regulatory amendments are proportionate to the issue being addressed.

NCFA encourages the Government of Canada to consider whether more targeted and less burdensome solutions could achieve the same objective. For example, identify the specific regions where unmet slaughter capacity represents a significant challenge and develop targeted responses such as exploring provincial-territorial memoranda of understanding or other intergovernmental agreements that could address regional slaughter capacity issues without creating broader regulatory changes.

In conclusion NCFA does not oppose the proposed amendments, provided there is clear assurance that Canada's export market access, federal import standards, and food safety system will not be compromised.

However, we remain concerned that the proposed regulations may impose unnecessary regulatory burden to address a relatively small, regional issue. We encourage the Government of Canada to ensure that any final regulatory approach is proportionate, targeted, and maintains the integrity of Canada's internationally recognized food safety and inspection system while addressing localized processing capacity challenges.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Zang", is positioned above the title "President & CEO".

President & CEO