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Submission to Canada Gazette, Part I, Volume 160, Number 28: Regulations Amending Certain Regulations Relating to Harmonization of the Enhanced Feed Ban

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Introduction

The National Cattle Feeders' Association (NCFA) appreciates the opportunity to comment on the proposed *Regulations Amending Certain Regulations Relating to Harmonization of the Enhanced Feed Ban*, published in the *Canada Gazette, Part I* on July 11, 2026. NCFA represents cattle feeders across Canada and advocates for a competitive, sustainable and innovative cattle-feeding sector. Canada's cattle industry operates within an integrated North American marketplace, making science-based regulation, regulatory efficiency and alignment with the United States particularly important to Canadian competitiveness. Regulatory differences between Canada and the United States can create additional costs for Canadian businesses and put the Canadian cattle industry at a competitive disadvantage to trading partners.

NCFA supports the proposed amendments as an appropriate step toward risk-based, science-based and internationally aligned regulation.

Background

The Enhanced Feed Ban (EFB) played an important role in protecting animal health, food safety and consumer confidence following the BSE crisis of the early 2000s. However, Canada's BSE risk profile has changed significantly since the current framework was introduced. Canada has maintained World Organisation for Animal Health (WOAH) negligible BSE risk status since 2021, and federal risk assessments have concluded that the proposed changes can be implemented without increasing BSE risk when appropriate safeguards remain in place.

The current EFB can require additional handling, segregation, transportation and disposal of material that may have productive uses under a risk-based framework. Allowing eligible lower-risk SRM to enter approved non-ruminant feed, fertilizer and pet-food pathways can reduce waste and create additional economic value, improving both our environmental footprint and financial benefit. This is particularly important in an industry facing significant cost pressures, and regulatory modernization should help

Canadian agriculture remain competitive by removing requirements that no longer provide a proportionate benefit

Amendments

NCFA supports maintaining the fundamental safeguards that protect cattle and the food supply. In particular, the prohibition on feeding prohibited material to ruminants must remain the cornerstone of Canada's BSE control system, and we support maintaining the prohibition of designated specified-risk material (SRM) in human food.

We support the allowance of designated lower-risk SRM to be used in appropriate non-ruminant feed, fertilizer and pet-food pathways, while maintaining controls over the pathways that present meaningful BSE risk. The risk analysis conducted for these amendments has been extremely thorough and demonstrates that these changes would maintain the same high levels of food safety and health for both people and animals.

Most cattle feeders are not directly responsible for handling SRM or determining its end use, therefore we want to ensure that implementation of new protocols does not create additional or unnecessary requirements for them. Where controls are necessary, they should be applied at the point in the supply chain where the relevant risk exists.

CFIA should provide clear, practical implementation guidance to slaughter facilities, renderers, feed manufacturers and other affected businesses, with sufficient lead time before the amendments come into force. To be successful, there needs to be a definitive understanding of what is required and an adjustment period to determine how those changes can be incorporated within existing processes.

Recommendations:

1. **Implement the proposed flexibility for SRM** in a manner consistent with the U.S. regulatory framework where science supports equivalency.
2. **Simplify the terminology used** related to the naming and definitions of various materials. We support consistency with US terminology which could improve the understanding and acceptance of products moving across the border.
3. **Ensure implementation does not create unnecessary regulatory or administrative burdens**, particularly for cattle feeders and other supply chain participants that are not directly involved in SRM handling. Leveraging existing permits and processes as much as possible will support successful implementation.
4. **Provide clear and practical implementation guidance** before the amendments come into force and rely on existing systems wherever possible. As part of this, there needs to be clear guidance and training for CFIA staff prior to implementation, and industry engagement throughout the process to ensure expectations are clearly understood, especially with the meat processing sector.

Conclusion

NCFA encourages the Government of Canada to continue pursuing regulatory alignment with the United States. Canada's cattle industry has a strong interest in maintaining effective BSE controls and protecting the integrity of Canada's food system. The success of those controls, however, should allow Canada to confidently modernize its regulatory framework as the underlying risk changes.

The proposed amendments provide an opportunity to maintain the safeguards that matter most while reducing unnecessary regulatory burden, improving value recovery and strengthening Canada's competitiveness within an integrated North American beef industry.

NCFA supports the proposed amendments and encourages the Government of Canada to proceed with implementation. We appreciate the opportunity to provide these comments and looks forward to continuing to work with CFIA and the Government of Canada on practical, science-based regulatory modernization.