



March 22, 2019

Re: Canadian Livestock Identification and Traceability Program pending regulations

On behalf of the Provincial and National Associations for Agricultural Societies, Exhibitions and Fairs:

Dear Honorable Member of Parliament:

Over the past several years, our associations have been asked to participate in discussions and feedback sessions with both federal and provincial governmental bodies to better understand the intended impacts and, to some degree, the unintended impacts of new legislation slated for release and review in the spring of 2019.

We understand and fully support the need for a fully integrated national livestock identification and traceability program, including premise identification and the compliance of livestock owners for animal identification through federal approved tags and timely reporting of related transport information.

Agriculture is a significant industry in Canada, with immensely diverse types of farming and ranching operations. Our fairs/exhibitions and agriculture societies are a small part of the overall footprint of agriculture in Canada. That being said, fairs/exhibitions and agriculture societies play an important role within our communities in bringing together livestock producers to showcase their animals for “recreation-non commerce” through competitions in the show ring and for education to consumers of the farm to plate journey of their food. Some commerce does take place at their facilities, primarily in the format of sales or auctions organized by third parties who rent the facilities from the fair or exhibition, or the fairs/exhibitions produces the event themselves. Regardless of the event being produced by fairs/exhibitions, agriculture societies or a third party they will need to be compliant of ownership regulations and related transfer of ownership information.

Much of the fair and exhibition industry is volunteer driven, demonstrating proven experience in managing facilities and creating a forum to share best practices and the showcase of livestock, leaving the animal related care and regulatory compliance with the owners as they are best suited to provide this management for their animal related activities. This model serves both the fairs/exhibitions and livestock participants extremely well as it allows for the efficiency and effectiveness of all parties skills and expertise to be utilized. Currently the owners have been regulated to comply with transportation and reporting information processes, a change in that historic activity may challenge the integrity of a proven system that works.

To summarize the position:

1. **Livestock Traceability System-** Fairs and exhibitions fully appreciate the effort required to create a unified and comprehensive Canadian Livestock Traceability system and support the purpose of an elevated traceability system.
2. **Premises Identification-** Fairs and exhibitions understand the importance in complying with the registration of their facilities and need to ensure that they are compliant.
3. **Animal Identification-** Tags or other federally approved methods are critical. As our fair and exhibition expertise and resources are not compatible to being an approved tagging facility, our position is that animals must leave the farm with approved identification, in the event that a tag is lost in transport, it is the responsibility of the owner to resolve identification issues before gaining access to events and will not be granted entry to our facilities if not compliant.
4. **Ownership=Regulatory Care & Compliance-** Fairs and exhibitions strongly believe that these management practices and related reporting are the responsibility of the owners.
5. **Recreation Shows/Education-** Fairs and exhibitions are against the requirement of the facilities and related property to collect and report animal identification data. The fair and exhibition expertise is in managing facilities with finite financial resources, providing the venue for livestock producers’ participation, education and public interface with the consumer.

**Conclusion-** The consequences if traceability regulations transfer the responsibility to the facility vs the owner are several.

1. Noncompliance is a risk because volunteer organizations will not have the capacity to report and will fail to report.
2. Opportunities for events to take place will diminish as fairs and exhibitions may choose not to host events because of the increased complexity of organizing a show.

***To discuss this position further please contact your Provincial or National Association for Agricultural Societies, Exhibitions and Fairs.***

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