



FROM THE flock

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Click on the report below to read the *RBC Report on Business & the Environment: Agriculture 2012* to learn more about the risks and business opportunities associated with the environmental sustainability challenge.



USDA Announces releases 'Comprehensive BSE Rule' for Comment

The U.S. Department of Agriculture's (USDA) Animal and Plant Health Inspection Service (APHIS) has announced the publication of its proposed rule on Bovine Spongiform Encephalopathy; Importation of Bovines and Bovine Products (APHIS-2008-0010). This 'Comprehensive BSE Rule' proposes to amend the regulations that govern the importation of animals and animal products with regard to bovine spongiform encephalopathy (BSE).

"This proposal is an important step forward in our efforts to bring our import regulations in line with science-based, international animal health standards..." said Dr. John Clifford, APHIS Deputy Administrator and Chief Veterinary Officer at a press conference held in Washington on March 9th. The proposed rule will base importation conditions on the inherent risk of BSE infectivity in specified commodities based on a system of classifying regions for BSE risk, consistent with the system employed by the World Organization for Animal Health (OIE). The level of BSE risk assessed to a region determines the import restrictions applied to both live animals and animal products originating from that region.

The proposed rule change will see Canada classified as a minimal-risk region, were APHIS recognizes the process used by the OIE to make that determination. This recognized minimal-risk assessment will change regulations governing imports of live animals and animal products into the U.S. from Canada. In this proposal live bovines would be able to move from Canada to the U.S. for reasons other than immediate slaughter, provided the outlined requirements are met.

In this proposal, no changes will be made to the existing import regulations for goats and sheep and APHIS will continue to apply the current import prohibitions and restrictions regarding live small ruminants and their products. The U.S. is in the process of developing a proposal to amend the BSE regulations as they affect the importation of ovines and caprines and their products, which will be published upon completion. Any comments submitted concerning this current proposal with respect to sheep and goats will not be addressed in this round of rulemaking but will be considered in the development of the upcoming rule regarding small ruminants.

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This full proposed rule is available for review on the USDA website: <http://www.regulations.gov/#!documentDetail;D=APHIS-2008-0010-0001> or Docket No. APHIS-2008-0010. APHIS will be accepting public comments on the proposed rule for a period of 60 days following its publication, and comments can be submitting electronically via: <http://www.regulations.gov/#!submitComment;D=APHIS-2008-0010-0001> or can be mailed to: Regulatory Analysis and Development, PPD, APHIS, Station 3A-03.8, 4700 River Road, Unit 118, Riverdale, MD 20737-1238.

Funding for the National TSE Eradication Plan is provided through Agriculture and Agri-Food Canada's (AAFC) Agricultural Flexibility Fund, as part of Canada's Economic Action Plan. Opinions expressed in this document are those of the Canadian Sheep Federation and not necessarily those of AAFC.

Update on Proposed Import Changes

In the November issue of From The Flock, we presented the CFIA's proposed changes to requirements for importing small ruminants from the United States for breeding, domestic or captive purposes. The proposed changes included imposing import restrictions for male small ruminants similar to those currently in place for females, with an additional option of importing rams of specific genotypes (see FTF, November 2011).

Industry members provided comments on the proposed import changes which were submitted to the Canadian Food Inspection Agency. In principle, the small ruminant supports the move towards scrapie eradication but fell short of endorsing the proposed import policy changes. The changes would significantly limit producer's ability to import males, especially bucks and rare breeds of sheep.

The industry urged the CFIA to consider alternative import requirements that would permit continued access to US genetics, and suggested re-visiting live animal testing import conditions first proposed by the CFIA in 2009 that were later rescinded. This live animal testing would have required a RAMALT biopsy be collected and test negative for scrapie prior to import and again at a set period following import. An additional negative RAMALT biopsy would have been required before the animal could be removed from the importing farm. RAMALT biopsy testing can be used on both goats and sheep.

Following an internal review of industry comments, the CFIA issued a statement upholding the proposed import policy changes as they were originally presented, turning down industry's request to explore a RAMALT biopsy testing alternative for imports of males. In support of their decision, the CFIA cited the need to decrease the level of acceptable risk associated with imports in parallel with increased domestic eradication efforts.

The CFIA further suggested that limitations with RAMALT testing in relation to its ability to reliably detect scrapie, along with the 'cumbersome and impractical' logistics of implementing the testing over time, make this live animal testing option unavailable at this time.

What are your thoughts regarding the proposed policy changes and the process to date? Click on this link to express your point of view:

www.surveymonkey.com

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A Legislative Framework for Traceability: Proposed Elements



Context

Introduction

Good planning starts with listening. The Canadian Food Inspection Agency (CFIA) consults with Canadians on issues, enabling public input to the development of public policies and programs. The Agency works to ensure that as many people as possible representing consumers, businesses, associations and individual Canadians get the opportunity to have their say in policy development.

The purpose of this paper is to engage Canadians and stakeholders to obtain views on elements of a possible legislative framework for livestock and poultry traceability in Canada. This framework would be enabling. Detailed requirements and obligations for stakeholders will be developed, in the future, through a separate consultation process as regulatory proposals are prepared under this framework. These regulations will be implemented for a species of animals (or multiple species), in a phased-in manner based on industry readiness and extensive consultations with affected stakeholders. These consultations are required, and represent an important part of the regulatory approval process.

Traceability is defined as the ability to follow an item or group of items - including animals, plants, food products and agricultural inputs such as feed, seed or ingredients - from one point in the supply chain to another. This paper will focus on the proposed elements of life-cycle traceability for livestock and poultry species.

For the purposes of this paper, life-cycle traceability refers to the scope from birth of an animal on a Canadian farm or import into Canada, up until its death (on-farm or at slaughter) or export out of Canada.

In 2006, federal, provincial and territorial Ministers of Agriculture committed to phase in the National Agriculture and Food Traceability System, and mandated the Industry-Government Advisory Committee on traceability to provide a forum for cooperation and coordination among governments and industry. In the summer of 2009, Ministers committed to move forward on a comprehensive, mandatory national traceability system for livestock and poultry, which is critical for managing animal health and food safety issues, as well as expanding market access and driving efficiencies.

To deliver on this commitment, the federal government proposes to develop a national legislative framework for traceability of animals. The proposal will strengthen Canada's existing traceability framework under the Health of Animals Act, which already includes authorities for animal identification requirements and elements of movement reporting. The proposed framework will enhance Canada's ability to: effectively manage animal health and related human health issues; rapidly respond to disease outbreaks and natural disasters (e.g. floods, ice storms) affecting the Canadian agricultural resource base; and efficiently respond to food safety issues that may originate from the animal resource base.

Depending on the sector to be regulated, the framework would require reporting of timely, accurate and relevant traceability information to databases maintained by industry-led administrators (e.g. Canadian Cattle Identification Agency (CCIA)) and would have strong provisions to ensure the protection of private and confidential business information. It would also allow for the sharing of traceability information among authorized stakeholders for intended uses.

Beyond being a tool to manage animal and related human health and food safety issues, traceability could provide tangible benefits to industry through reduced economic impacts of animal health emergencies, and could play a role to help maintain existing domestic and international markets, and gain new ones.

The following are the proposed elements to enable implementation of livestock and poultry traceability:

| | | |
|--|--|---|
| <p>Animal Identification</p> | <p>The proposed framework would retain the current animal identification requirements that exist under the Health of Animals Act and Regulations and would permit further development of specific regulatory requirements, which could include:</p> | <ul style="list-style-type: none"> • Ability to confirm the identity of an animal either by determining if a unique identification device has been applied to an animal or by allocating a group (lot or flock) identification number; • Ability to enable the use of alternative methods of identification for certain species (e.g. DNA, retinal scan) with evolution of science and technology; • Ability to require the identification of imported animals in a manner consistent with existing requirements for domestic animals; and • When there is industry support for the collection of the information, ability to require the collection of information related to additional attributes of animals (e.g. breed, genetic enhancements). |
| <p>Location Identification</p> | <p>Identification of locations where animals can be found is critical for any traceability system. The identification and validation of premises (at a land-parcel level) is a provincial responsibility. Provinces are taking various approaches for implementing premises identification. To help ensure consistency, the federal framework would require that locations be identified so that key movements can be reported. This requirement would permit the use of existing provincial and territorial premises registries (mandatory or voluntary), as long as they are built on national standards adopted by federal, provincial and territorial governments. When there is an agreement with industry on key locations that should report traceability information, the development of specific regulatory requirements could include:</p> | <ul style="list-style-type: none"> • Ability to require the identification of locations where animals are kept, assembled or disposed of; • Ability to require that locations be identified prior to animals being moved to and from those locations; • Ability to maintain and link the identity of an animal with its location of birth/origin and other key locations where the animal has been during its life within Canada; and • Ability to know the locations that are registered as linked, i.e. premises which are considered as a single (animal health) unit because of the regular movements of animals/products between them. |
| <p>Movement and Other Event Reporting</p> | <p>Movement reporting is essential for an effective traceability system. The scope of movement information requirements, by species, would be developed through extensive and transparent consultations between the CFIA and industry. Once the technology permits and the industry infrastructure is in place, the proposed framework would require reporting of animal movements and other events critical for disease management and food safety to an industry-led administrator (e.g. CCIA). This authority would permit development of specific regulatory requirements, which may include the following:</p> | <ul style="list-style-type: none"> • Ability to relate the identity of an animal with important movements along the life-cycle continuum; • Ability to require custodians of animals to report key animal movements during their lives, including the identification (e.g. license plate) of means used to move animals; • Ability to establish which animals came in contact with others during movement from one location to another; • Ability to require the reporting of certain movement information at designated geographical check-points or zones (e.g. West Hawk Lake); • Ability to require reporting of events (e.g. allocation, manufacture, distribution, sale, application, activation, replacement, retirement) related to approved means of identification (e.g. ear tags); and • Ability to require custodians to report other events (e.g. animal importation and exportation). |

| | | |
|---|--|---|
| <p>Authorized Uses and Sharing of Information</p> | <p>The current animal identification program in Canada requires the collection of personal and confidential information. Similarly, some provinces require regulated parties to report personal information under provincial traceability frameworks (e.g. Quebec, Alberta and Manitoba). The proposed traceability framework would require the collection of additional information (e.g. reporting of key movements) that will be managed by industry-led administrators. To address stakeholders' concerns about appropriate protection of that information, there would be provisions in the legislation outlining authorized access to and intended uses of traceability information. These authorities would add to the protection provided by the federal Privacy Act. The authorities would permit the development of specific regulatory requirements, which could include:</p> | <ul style="list-style-type: none"> • Ability to clearly define authorized and appropriate uses of traceability information. The information collected under this framework would only be used for those purposes; • Ability to enable access to traceability information for use by provincial and federal governments, as well as others (e.g. veterinarians and emergency responders) entrusted to manage animal, human health and food safety issues; and • Ability to allow access to aggregate and non-personal information contained within the traceability databases for purposes other than the management of health issues and emergencies such as: animal demographic studies, analysis of disease trends, simulations of disease outbreaks. |
| <p>Compliance</p> | <p>The legislative framework would include provisions to promote compliance by regulated parties. To achieve compliance, the CFIA would take a progressive approach beginning with education, advice and awareness building; followed by inspections and enforcement actions, where necessary. More specifically, the framework would permit:</p> | <ul style="list-style-type: none"> • Ability to create offences and penalties for unauthorized uses and disclosures of personal information collected under the framework. • Ability to create prohibitions, e.g. failure to identify an animal prior to its sale; an • Ability to develop and employ a compliance and enforcement program prescribing responsibilities for all stakeholders and defining contraventions of those provisions. |
| <p>Reporting and Record Keeping</p> | <p>The current animal identification program in Canada mandates the reporting of information to the appointed industry administrator. At present not-for-profit industry-led organizations, such as CCIA and Agri-Traçabilité Québec (ATQ), collect information from regulated parties. The framework would use the same approach to require the reporting of information to appointed industry administrators. The framework would permit:</p> | <ul style="list-style-type: none"> • The reporting of animal and location identification data, and movement information in a prescribed format, manner and timeframe. • Ability to conduct compliance verifications based on on-site records corresponding to the data submitted to industry-led administrators. • Recording and retaining information corresponding to some events that may be excluded from the reporting requirements (e.g. record keeping requirements for movement of sheep 18 months of age or older under section 175.1 of the Health of Animals Regulations). • Establishment of clear guidelines and schedules for the retention and disposition of personal and confidential data collected under the traceability framework. • Expedited requirements for the reporting of traceability information during emergencies. |

Legislative Framework continued

Additional Considerations for a Traceability Framework

Cost-sharing: Cost-sharing, is a national principle in the development of traceability systems. It recognizes that the benefits of traceability will be realized by both society in general and industry. Through the Industry-Government Advisory Committee, industry and governments are working together to develop a cost-sharing framework. This approach will result in a fair, cost-effective and financially sustainable system.

Standards: To ensure an effective national system, the federal, provincial and territorial governments will establish various standards for traceability, e.g. standards for reporting and recording of traceability data. For interoperable and seamless information systems, the standards could be incorporated in regulations developed under the framework. The system will strive to be flexible to allow for the evolution of those standards.

Technology and Traceability National Information Portal (TNIP): Technology will play a key role in the implementation of traceability systems. Stakeholders recognize that technology should permit implementation of traceability systems at the speed of commerce. The development and implementation of TNIP is a key component of Canada's proposed framework and would provide authorized users with a single point of access to compile information about animal identification, location identification and movements of animals, as maintained in a number of provincial and industry-led databases. Information sharing agreements would have to be negotiated to facilitate the sharing of information via TNIP. This information could be cross-referenced with geo-positioning tools to achieve the most rapid, targeted, and effective method for responding to disease outbreaks or food safety issues.

Flexible Implementation: The legislative framework would contain enabling authorities for implementing traceability framework. The CFIA intends to develop a flexible framework and is considering including authorities to: requiring certain information to accompany animals during their movements; and requiring establishment of designated geographical check-points or zones (e.g. West Hawk Lake - Ontario/Manitoba border) and requiring reporting of certain information at these check-points. The intent is to have legislative authorities in place and implement regulatory requirements at a later time in consultation with stakeholders.

Next Steps

The federal government is considering options for developing and implementing a legislative framework for traceability. Regulations would be developed, once the legislative framework is in place. These regulations would be implemented for a species (or multiple species), in a phased-in manner based on industry readiness and extensive consultations with affected stakeholders. To inform the development of the legislative framework, the CFIA looks forward to receiving feedback from the interested parties on the proposed elements outlined in this paper. Written comments should be forwarded before May 3, 2012 using the contact information provided under How to get in touch with us section of this document.

How to get in touch with us

The CFIA looks forward to receiving feedback from the interested parties on the proposal for a legislative framework for traceability. Written comments should be forwarded by May 3, 2012 to:

Peter Pauker
Manager - CFIA Traceability Group
Domestic Policy Directorate
1400 Merivale Road,
Ottawa, Ontario, K1A 0Y9

Written comments may be sent by facsimile to 613-773-5695 to attention of Peter Pauker (Re: Trace Consultations). The comments may also be sent via email to trace.consultation@inspection.gc.ca



Canadian Sheep Federation Tag Assessment Form

The goal of this assessment form is to assist the CSF in assessing the performance of official CSIP tags. The form provides producers, tag users, the opportunity to give feedback on the CSIP tag performance over time and in farm situations. This feedback will assist in identifying issues that the CSF may need to examine with manufacturers. By providing the CSF with feedback on tags, producers will help ensure that the industry is being provided with the best tags possible.

Please complete the form with as much detail as is known.

Include, when possible, any damaged or tags found that animals have lost. These problem tags will help identify manufacturing or usage issues.

Upon completion of the form please forward by mail with damaged or recovered lost tags to:

Canadian Sheep Federation 130 Malcolm Road Guelph Ontario N1K 1B1

| | |
|----------------|----------------|
| Date: | |
| Producer Name: | Email Address: |
| Phone #: | |
| Address: | Province: |

1. Tag Brand Involved: _____ CSIP tag #, if known _____
2. Applicator: Allflex red without black insert / with black insert; Shearwell green without red insert / with red insert; other? If other please indicate what brand: _____
3. When were tags purchased? _____
4. Where were tags purchased? _____
5. When were the tags applied? Lambing ___ Weaning ___ Shearing ___ Adult ___ Other _____

Please Explain

-
6. Date applied, if known? _____
 7. Weather/temperature at time of tag application, if known? _____
 8. When was the tag related problem identified? _____

Please Check

- ___ on application?
- ___ on pasture?
- ___ in a feedlot or pen?
- ___ in yards or handling facilities?
- ___ at shipping?
- ___ other?



Canadian Sheep Federation Tag Assessment Form

Please Explain

9. Nature of Issue:

- | | | |
|---|-----|----|
| • Lost or missing tag? | Yes | No |
| • If yes, was the sheep's ear torn (i.e. tag ripped out)? | Yes | No |
| • If the ear was not ripped, is there an obvious hole? | Yes | No |
| • Did an Infection occur? | Yes | No |
| • Did the infection require treatment? | Yes | No |
| • Was the treatment successful? | Yes | No |
| • Did the infection necessitate removal of the tag? | Yes | No |

10. Farm Production Unit Description and/or environmental factors:

- | | | |
|--|-----|----|
| • Are your sheep primarily confined? | Yes | No |
| • Are your sheep primarily pastured? | Yes | No |
| • Are your sheep housed over winter? | Yes | No |
| • Are your sheep fed forage from a feeder? | Yes | No |
| • Do you think feeder design could be a problem? | Yes | No |

11. Are your sheep enclosed with any of the following fence types?

- | | | |
|-------------------------|-----|----|
| • Page wire | Yes | No |
| • High tensile electric | Yes | No |
| • Wooden picket | Yes | No |
| • Rails or board | Yes | No |

12. Do your sheep have access to the following?

- | | | |
|--|-----|----|
| • Machinery yards, functioning or scrap | Yes | No |
| • Fence lines that contain thorns and or brush | Yes | No |
| • Do you feed baled forage? | Yes | No |
| • Pastures with trees and bush? | Yes | No |

How are your tags stored?



Canadian Sheep Federation Tag Assessment Form

Producer 's Observations and Comments:

Follow-up requested: Yes No

Follow-up provided:

Staff use only:

Action taken:

Date: _____ Signature: _____

The CSF would like to sincerely thank you for your time and consideration for filling out this important and valued information.