

January 9, 2023

Michael Richardson
Food Safety and Environmental Policy Branch
1 Stone Road West
Ontario Government Building, 2nd floor, Southwest
Guelph, ON, N1G 4Y2

Submitted online and sent via email to michael.richardson@ontario.ca.

RE: ERO 019-6320 Proposed amendments to the *Animal Health Act*

Dear Mr. Richardson,

On behalf of Chicken Farmers of Ontario's (CFO) 1,300 family-run farms across the province, we are writing today in support of ERO 019-6320: Proposed amendments to the *Animal Health Act, 2009*, to enhance animal health preparedness and to make additional updates to the legislation. CFO supports these proposed amendments as they are aligned with our risk mitigation priorities and promote animal welfare, food safety and supply chain security.

The experience of the poultry sector over the last ten months has demonstrated the importance of a collaborative, effective, and rapid response when Highly Pathogenic Avian Influenza (HPAI) is detected in the environment.

CFO continues to support the Canadian Food Inspection Agency (CFIA) as lead organization in the HPAI outbreak response, and is working with the Ontario Ministry of Agriculture, Food, and Rural Affairs (OMAFRA), and the Feather Board Command Centre (FBCC) to continue to reduce the risk of spread of HPAI on-farm.

Ontario's regulated feather boards, operating under the responsible supply management system, work together through the FBCC to prepare, respond, and mitigate poultry disease spread in Ontario. Immediately following the first detection of HPAI in the Ontario, on March 26, 2022, the feather boards coordinated a provincewide response and implemented heightened biosecurity requirements to protect flocks and the supply chain. A similar response was activated on September 18, 2022, after HPAI was once again detected following four months without a new on-farm infection in the province.

However, as we observed, the inability to regulate the poultry sector that does not operate under supply-management, as well as backyard flocks, show birds and auctions during disease outbreaks is a vulnerability that can lead to economic hardship for supply-managed poultry farmers and their industry partners, and have potential to create significant supply chain and trade disruptions.

To address this vulnerability, CFO appreciates OMAFRA's leadership in implementing Minister's Orders in both the Spring and Fall of 2022, which restricted the commingling of birds by prohibiting shows, auctions, and other exhibitions.

The first of these orders came into effect on April 8, 2022, nearly two-weeks after the first detection. In the Fall, the Minister's Order was established more rapidly, with a five-day delay between detection and implementation.

The proposed amendments to the *Animal Health Act, 2009*, which would allow for a temporary response order, effective for up to 72 hours, would permit a more immediate response by the Ontario Minister of Agriculture, Food, and Rural Affairs, upon advice from the Chief Veterinarian for Ontario. Further, the opportunity to extend the temporary response order for an additional 72 hours upon the recommendation of the Chief Veterinarian for Ontario, can be utilized while a longer-term Minister's Order is developed and established, if necessary.

CFO encourages OMAFRA and the Chief Veterinarian for Ontario to develop further policies and procedures that establish criteria and streamline the implementation of animal health emergencies related orders, when necessary. CFO would be pleased to collaborate in order to strengthen our collective ability to reduce the risk of spread in an animal health emergency, such as HPAI.

Ontario's chicken farm-families always work hard to follow strict biosecurity, animal care, and food safety measures. Chicken farmers have consumers' trust for a good reason and will continue to deliver the high-quality chicken Ontarians expect.

We appreciate the opportunity to provide our feedback and support on ERO 019-6320: Proposed amendments to the *Animal Health Act, 2009* to enhance animal health preparedness and to make additional updates to the legislation.

Regards,



Murray Opsteen, Chair
Chicken Farmers of Ontario



Denise Hockaday, CEO
Chicken Farmers of Ontario