

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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To Whom It May Concern:

Subject: Proposal to repeal section 76 of the *Health of Animals Regulations* – The authority for cervid movement permits

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers, and supporters, and 725 member clubs. We have reviewed the proposed changes to the *Health of Animals Regulations* as they relate to the federal cervid movement permits. We do not support the changes as we feel that the potential application of cervid movement permits to address disease spread is not being fully realized and the proposed alternatives (expanded traceability requirements and on-farm cervid surveillance) have not yet been finalized and implemented.

Cervid movement permits and chronic wasting disease

The proposal states that “the risk posed by the movement of farmed cervids in Canada is not what it was in the 1990s.” While this is certainly true of bovine tuberculosis (TB) and brucellosis, this statement and indeed the entire consultation document ignores the significant and expanding threat that chronic wasting disease (CWD) poses to both wild and captive cervids. In 2020 alone, CWD was detected on fourteen different cervid farms in Alberta and Saskatchewan. As of the writing of this letter, two additional Saskatchewan farms had tested positive for CWD in 2021, according to data available on the Canadian Food Inspection Agency (CFIA) website. In 2018, CWD was detected on a Quebec red deer farm. This marked the first Canadian cases of CWD in farmed cervids outside of Alberta and Saskatchewan. The overwhelming scientific consensus is that the movement of asymptomatic but infectious animals by the cervid farming industry has been a major driver of CWD's spread across North America. Only considering bovine TB and brucellosis in discussions of captive cervid disease in Canada paints a rosy but inaccurate picture.

During the 2019 federal election, the OFAH and our collaborators worked together in two groups to ensure CWD was given the recognition it deserves at the national level. The National Fishing and Hunting Collaborative (NFHC) is a group of non-partisan, non-profit fishing and hunting organizations that work collaboratively to provide national leadership on important conservation issues and a voice for more than 375,000 Canadians from coast-to-coast-to-coast. The Canadians Concerned About CWD (CCAC) is a network of conservationists, scientists, advocates, public servants, industry representatives, and concerned citizens from across the country and diverse backgrounds extending beyond the hunting and fishing community. One of the solutions proposed by both the NFHC and the CCAC was for the CFIA to add CWD to the cervid movement permit along with bovine TB and brucellosis. We feel that this still has merit. While the threat of bovine TB and brucellosis has abated, the existing framework can and should be used to address the threat of captive cervid movements spreading CWD.

Cervid traceability and on-farm cervid surveillance

In part, the CFIA attempts to justify the elimination of the cervid movement permit by stating that the traceability function of the permits “will be addressed with the introduction of federal traceability regulations for cervids.” We have been following the development of the *Amendments to the Health of Animals Regulations, Part XV (livestock identification and traceability)*. However, at this time those proposals have not been published in the *Canada Gazette, Part I*. Simply put, we are not comfortable supporting the elimination of the cervid movement permits under the premise that another program will fulfil the role, having not seen the finalized version of that program. This same position applies to on-farm cervid surveillance. We fully support increased on-farm surveillance, as this was another action identified by the NFHC and the CCAC. However, without an established surveillance program, it is premature to assume there will be no gaps caused by the elimination of the cervid movement permits.

Given these concerns, we recommend that the CFIA maintain Section 76 of the *Health of Animals Regulations*. Once the traceability and on-farm surveillance measures are put in place, a critical review should be conducted to evaluate the continued need for the cervid movement permits, including their potential role in addressing the spread of CWD. The results of this critical review would provide the information needed to have an informed consultation on the potential elimination of the cervid movement permits.

Need for expanded federal role in the movement of live cervids, carcasses, and parts

We recognize that this is not the focus of this consultation, but we would like to take this opportunity to highlight the need for more federal legislation on the movement of live cervids, carcasses, and parts across Canada’s international border. In efforts to prevent the introduction of CWD, many provinces including Ontario have enacted legislation to restrict the importation of certain cervid parts. Unfortunately, there exists a jurisdictional disconnect at the international border as agents with the Canada Border Services Agency (CBSA) do not automatically enforce provincial regulations. It is our understanding that there exist agreements with varying levels of formality between CBSA and provincial governments on how these regulations are enforced, but in order to ensure consistency in enforcement at the national level, federal legislation addressing this CWD pathway is badly needed.

Conclusion

While we feel that the CFIA is ultimately moving in a promising direction in creating a national livestock system that is resilient to disease, the planned traceability and surveillance measures must be put in place before there can be any discussion of repealing existing regulations.

Thank you for the opportunity to comment on these proposed changes to the *Health of Animals Regulations*.

Yours in Conservation,



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KM/jb

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