



*Long-Term Thinking  
for Today's Issues*

## **Christian Farmers Federation of Ontario**

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### **CFFO recommendations on proposed new rules regarding the Disposal of Dead Animals in Ontario.**

The Christian Farmers Federation of Ontario (CFFO) recognizes that livestock operations have to properly dispose of deadstock. However, the CFFO has a number of concerns over the proposed new regulations for the disposal of deadstock in Ontario. There are also a number of unresolved questions that arise from the proposal. The following are the CFFO recommendations on the proposal.

#### **Concerns**

1. The prescriptive Minimum Distance Separation distances and soil depth requirements outlined in the regulations may render some of the on-farm disposal methods to be nearly impossible to comply with.
2. The disposal of BSE-related SRM material in cattle that are buried or composted on-farm is of extreme importance because of the potential trade implications that it may have down the road. The CFFO believes that if Canada is serious about preventing cattle exposure to SRM material, then a system needs to exist that ensures that producers choose to have their animals picked-up by collectors and disposed of in a safe manner.
3. Since the BSE crisis occurred the economics of the disposal of dead animals has fundamentally changed. Prior to BSE renderers were able to pay a small amount for carcasses, but now they charge the collector for taking the animal. This cost has been passed down to the farmer.
4. The concerns listed above, if not dealt with properly, have the potential to create an environment where non-compliance is the most cost-effective method for farmers to undertake.
5. In addition, CFFO members are concerned with record-keeping requirements of the new legislation. The requirements are impractical, as cause of death is often unknown. At a time when government is searching for ways to reduce red tape, the requirements in this legislation are onerous for producers to comply, requiring information that provides little benefit to the farmer.

#### **CFFO Recommendations**

1. Government needs to take a strong role in ensuring that the system of deadstock collection is a winning environment for farmers, collectors, and renderers. To that end, the CFFO believes that it needs to extend and increase the financial support that collectors received, in a manner similar to the interim funding of the last number of years.
2. Furthermore, the collection of animals that contain Specific Risk Material related to BSE is essential to maintaining our export ruminant trade with the United States. Burial and composting on-farm are more risky options because of the potential impact on trade.

Furthermore, there is also the on-going risk of soil contamination with prions. The new system must be supported in a manner that encourages collection in a cost-effective manner. In addition, mandatory government funded pick-up of SRM risk animals be put in place to ensure long-term safety of the food supply.

3. Regarding the MDS requirements, there should be an option for the farmers to use an alternative process, which allows individual risk-based assessments to modify the MDS requirements. This process could be incorporated into a nutrient management plan.
4. The current draft of the regulations does not allow site-to-site transfer of properly regulated composted materials. The CFFO believes that the NMA rules that apply to manure transfer should apply to composted material.
5. The currently proposed regulations do not address the concerns over right of entry for inspectors, nor does it explain the grounds required to allow entry onto a premises. The proposed regulations need clear rules surrounding these issues in order to maintain proper bio-security. Investigators must have just cause to enter a premises, including a warrant. Furthermore, the CFFO believes that a full training program should be in place to ensure that investigators have a complete understanding of on-farm deadstock disposal practices.
6. The new requirements under the Nutrient Management Act (NMA) apply to all farm operations, including those that are not required to have a nutrient management plan in place. While the CFFO is not opposed to using the NMA to regulate the disposal of dead animals, we are concerned about the communications strategy that will be employed to ensure that small-scale producers realize that the new regulations apply to their operations. The CFFO recommends that the government work with commodity groups and general farm organizations to effectively communicate the changes.
7. Concerning compost, the 25 mm maximum size for remains is appropriate for flesh, hide and entrails. However, the requirement is unrealistic for bone materials from some animals. The presence of clean bones is not an environmental hazard and should be exempt.
8. The CFFO recognizes that some form of record-keeping is appropriate for the safe disposal of deadstock. The proposed approach to record keeping should examine standard operating procedures for on-farm food safety programs and build onto existing flock and herd management systems. There should be a goal of no duplication of records being required for farm operations.
9. On-farm burial should be seen as the least preferred method.
10. The CFFO supports efforts to improve public perception and understanding of agriculture, as well as disease and predator control surrounding the agriculture industry.
11. The CFFO wants to council government that the deadstock disposal regulations should not place the agriculture community at a competitive disadvantage with their relevant competitors.

***Adopted by  
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