



June 6, 2023

[Ontario Pork response to the Canada Gazette, Part I, Volume 157, Number 11: Regulations Amending the Health of Animals Regulations \(Identification and Traceability\)](#)

1. PigTRACE program

The PigTRACE program has been mandated by federal regulation since July 1, 2014. The pork sector has made great progress and experienced the value of the program in terms of preparedness and response to disease and food safety issues.

Ontario Pork believes that many of the proposed requirements found in this consultation will negatively impact the pork sector and we have identified specific issues and recommendations in our response.

Ontario Pork remains optimistic that addressing these issues during this public comment period will streamline regulatory requirements and improve overall compliance with the PigTRACE program.

2. Animal Identification

Incorporating the list of approved indicators into the regulations by reference:

- **We support the change to incorporate the list of approved indicators (ear tags, tattoos, etc.) into the regulations by reference.**
 - This is an improvement to the current practice of setting animal identification requirements within the regulation itself, which can only be modified through regulatory amendment.
 - This change will allow timely modifications to the approved use of pig identifiers that adapt to the realities and capabilities of the pork sector, which will improve regulatory compliance.

List of approved indicators:

- **We do not support the proposed changes to the list of approved indicators and believe that this will negatively impact the pork sector in terms of business decisions, human resources, animal welfare, and worker safety.**

The regulations currently require pigs to be identified with “any form of animal identification acceptable to the importing country.” Identifying pigs with approved PigTRACE identifiers, including herd mark ear tags and ear tattoos, has become standard practice for live exports to foreign farms and has been accepted by all foreign trading partners.

Proposed changes to the list of approved indicators exclude the use of herd mark ear tags and ear tattoos as methods of identifying pigs exported to foreign farms. The use of herd mark ear tags would be limited to “movement to an auction mart, an assembly yard or an abattoir within Canada, and for export for immediate slaughter.” The use of herd mark ear tattoos would be limited to “the movement

of unweaned piglets accompanied with their sow moved for educational purposes to a site, including fairgrounds and exhibition halls within Canada.”

Most pigs exported from Canada are destined for the United States. The USDA has accepted herd mark ear tags and ear tattoos as valid methods of identifying Canadian pigs shipped to U.S. farms since 2015.

We strongly believe that herd mark ear tags must continue to be a valid method of identifying all classes of pigs exported to any premises type in another country (i.e., farm or slaughter). Herd mark identification is more practical for movement reporting than 15-digit individual identification. Herd marks are also more easily traced to the farm of origin because it is a unique identifier for the premises.

We strongly believe that herd mark ear tattoos must continue to be a valid method of identifying isowean and feeder pigs exported to farms in another country. Ear tattoo identification of isoweans and feeder pigs has become a common practice for exports. Many U.S. purchasers of isoweans and feeder pigs prefer ear tattoo identification because they do not want ear tags on pigs that they have purchased for feeding.

Prohibiting the current practice of identifying exported pigs with herd mark ear tags and ear tattoos negatively impacts the reputation and usefulness of the PigTRACE program for the Canadian pork sector and our trading partners.

3. Approved use of herd mark identification with shoulder slap tattoos

Proposed changes to the list of approved indicators exclude the use of shoulder slap tattoos bearing a farm’s herd mark as an approved method of identifying pigs moved to slaughter by way of a collection site (e.g., assembly yard). The use of shoulder slap tattoos would be limited to “the movement of pigs directly from a farm to an abattoir within Canada and for export for immediate slaughter.” Pigs moving via a collection site would need to be identified with an approved PigTRACE ear tag.

We oppose the removal of shoulder slap tattoos as a valid form of identifying pigs moved from a farm to slaughter through one or more collection sites, including assembly yards, FWR (feed water and rest) stations, and transfer sites used for biosecurity purposes.

Shoulder slap tattoos are a critical part of animal identification and are unique to a premise and type of pig. If shoulder slap tattoos are removed from use, the impact on animal welfare and biosecurity could be severe as additional animal contact and handling would be required. There would also be significant costs incurred to use other methods of identification.

Requiring ear tags as the only option to identify market hogs negatively impacts animal welfare and human safety. Pig ears become prone to infection because ear tags are targets for nibbling by other pigs. Also, applying ear tags to market-weight pigs is dangerous and difficult for barn staff as most feeder barns do not have equipment for ear tagging pigs.

Shoulder slap tattoo identification is critically important for the movement of market hogs to slaughter. Federal abattoirs specializing in market hogs do not want ear tags in their facilities as they devalue the carcass and can introduce bacterial contamination and foreign materials (plastic) to meat products, which pose food safety risks and could negatively affect market access and consumer confidence.

Furthermore, shoulder slap tattoos are a reliable method of carcass identification for meat grading and payment/settlement at abattoirs that specialize in processing market hogs. It should be noted that processing culled breeding stock carcasses is different than market hogs. The hides are removed from culled breeding stock early in the process, and therefore ear tags are preferred for in-plant traceability by abattoirs specializing in processing culled breeding stock, including facilities in the U.S. where most Canadian culled breeding stock are processed.

Restricting the use of shoulder slap tattoo identification to direct farm-to-slaughter movements negatively impacts the viability of smaller, independent farm operations who cannot generate large enough loads of pigs to ship to federal abattoirs. The proposed change to only allow slap tattoos for direct farm-to-slaughter movements would financially penalize and restrict market access for smaller, independent farm operations.

Assembly yard collection sites perform an extremely valuable role in serving smaller farms by cost-effectively flowing their market hogs and off-spec/lightweight hogs to the appropriate slaughter facilities by assembling full loads of like-sized and quality pigs. Without this service, small farms would have severely restricted market access.

The consultation states that the use of shoulder slap tattoo herd marks for pigs going to slaughter via a collection site has led to compliance verification challenges.

CFIA has not provided Ontario Pork with any information or statistics on the number and/or types of issues with the use of shoulder slap tattoos. How often does this occur and with whom? Has CFIA attempted to address this with communication, education, and follow-up discussions? Ontario Pork recommends that CFIA undertake further dialogue with the pork sector on issues with compliance verification.

Ontario Pork supports ensuring shoulder slap tattoos are legible by promoting best practices for tattoo identification. We also support ensuring collection sites support and assist CFIA inspectors when conducting inspections for compliance and disease surveillance.

Ontario Pork would welcome an opportunity for discussions with CFIA to further understand their issues with shoulder slap tattoos and how industry can work with CFIA to address communication, education, and compliance issues.

4. Pig movement reporting

Ontario Pork supports the proposed change to require Premises Identification Numbers (PIDs) when reporting movements of pigs to the administrator (CPC-PigTRACE for pigs). The pork sector has made use of PIDs for over 10 years, including for movements reported to PigTRACE. **We also support the proposed change to eliminate record-keeping requirements for swine operations.** The current requirement is to maintain on-site movement records for five years. This is redundant since movement records are reported to and kept in PigTRACE.

However, we oppose the following proposed changes to movement reporting requirements for pigs:

Deadstock pickup

1. Section 184.7(1.1) proposes expanding current reporting requirements for carcass pickup to include: Premises ID of destination site (currently allows company name), number or combined weight of pig carcasses (currently not required), and vehicle license plate (currently not required).

Ontario Pork recommends eliminating the requirement to report carcass pickup by the departure site and instead relying solely on reporting arrival at the destination disposal site (e.g., rendering facility or landfill). Rendering facilities provide timely and good quality data submissions with respect to the movement of carcasses. We as departure site operators are often unaware when carcasses are removed from our sites by disposal companies and do not have the required information to report to PigTRACE. We will not be able to comply with this requirement and cannot understand how it benefits overall traceability when destination disposal sites already report complete and better-quality information to PigTRACE.

Pig movement (assembly and collection yards)

2. Section 186(d) would require collection sites to report pig identification numbers along with outgoing movement reporting for export movements.

Ontario Pork recommends collection sites be exempt from reporting identification numbers for all incoming and outgoing shipments of pigs, regardless of pig class, including those being exported to another country for slaughter (i.e., culled sow or market hog). It is a significant challenge for assemblers to read and report pig identification numbers. Experience has shown that the destination abattoir is best positioned to read and report pig identifiers and accurately reference them for traceback in the event of animal health or food safety issues. Little is gained from also requiring the shipping collection site to read and report pig identifiers, especially given the burden to human resources.

Pig movement (farm to destination)

3. Sections 184(1)(c) and 184.5(1)(c) would require the operator of a destination site to report the date and time of departure from the departure site.

Ontario Pork recommends eliminating the proposed requirement for destination sites to report the date and time that pigs departed from the departure site. The current requirements for PigTRACE, which have been in place since July 1, 2014, involve movement reporting by both the departure and destination sites (i.e., dual reporting). This reporting includes date and time of departure (by the departure site) and date and time of arrival (by the destination site). Movement reporting to PigTRACE therefore already has “date and time of departure” for all movements. The proposed requirement is an unnecessary duplication of information already captured in PigTRACE.