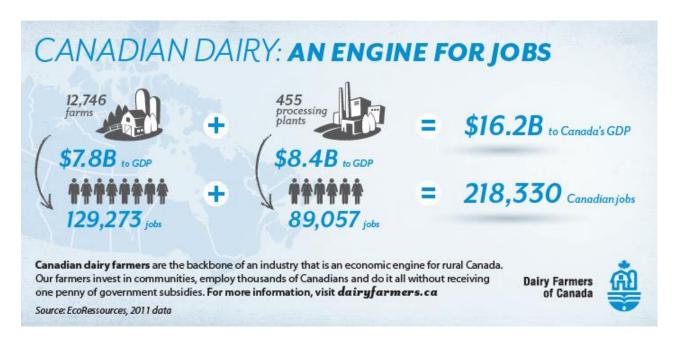




DAIRY FARMERS OF CANADA (DFC)

Run by farmers, for farmers, DFC is the voice of Canadian dairy farmers. DFC is the national lobby, policy and promotion organization representing Canada's farmers living on more than 12,000 dairy farms. DFC strives to create stable conditions for the Canadian dairy industry, today and in the future. It works to maintain policies that foster the viability of Canadian dairy farmers and promote dairy products and their health benefits.

DAIRY SECTOR CONTRIBUTION TO CANADIAN ECONOMY







CANADIAN DAIRY: CONTRIBUTING TO A STRONG AND STABLE ECONOMY

- In 7/10 Canadian provinces, dairy is one of the top two agricultural sectors.
- Canadian dairy farms shipped 7.8 billion litres in 2011; an increase from the 7.6 billion litres of milk shipped in 2009.
- The sector's GDP contribution has risen from \$15.2B in 2009 to \$16.2B in 2011, and the contribution to Canadian employment market grew from 215,104 to 218,330 over the same time period.
- The Canadian dairy industry contributes annually more than \$3 billion in local, provincial and federal taxes.
- In British Columbia, 45% of agricultural workers are employed on supply-managed farms (dairy, poultry and eggs).
- More than half of the farm sector revenues in Nova Scotia come from supply managed products -- in fact, dairy alone accounts for 28% of all the farm sector revenues in the province.
- On Prince Edward Island, Amalgamated Dairies Limited (ADL) processes close to 100 million litres of milk each year, employing more than 250 people.
- In Ontario and Québec, thousands of farms and processing plants dot the landscape.
- Canada's artisan cheese makers can be found all across Canada and provide significant economic benefits to their local communities.
- Canadians spend 11.8% of disposable income on food. That's one of the lowest in the world; and only 1.07% is spent on dairy products.





BILL C-18

Dairy Farmers of Canada wishes to thank the House of Commons Standing Committee on Agriculture and Agri-Food for the invitation to comment on Bill C-18 which proposed to amend other acts dealing with agriculture and agri-food.

Dairy Farmers of Canada's position on Bill C-18 is well reflected through comments made by Mr. Ron Bonnett, president of the Canadian Federation of Agriculture, soon after the bill was presented to Parliament. Referring to plant breeders rights, Mr. Bonnett indicated that the legislation strikes a good balance between plant breeder's investments in the development of new varieties and the farmer's ability "to save, store and condition seed for their own use". Dairy farmers depend on continuous improvements in forage and grain varieties to increase their productivity.

One important element of Bill C-18 for dairy producers is the Feed Act. Bill C-18 will result in a major renewal of the feed regulations. Dairy Farmers of Canada along with the animal nutrition industry and other animal and fish commodities are involved in thorough consultations which will likely result in a set of regulations accommodating a modern animal and feed industry while protecting food safety and the health of consumers. Dairy Farmers of Canada is acknowledging the Canadian Food Inspection Agency for its foresight and leadership for the modernization of the feed regulations.

Regarding animal health regulations, the proposed changes are addressing existing gaps in the current regulations. Dairy farmers are looking for a positive outcome. The changes require careful monitoring and analysis to ensure that the changes do not affect negatively other aspects of animal health regulations.





The concept of "incorporation by reference" introduced in Bill C-18 is an element of particular interest to dairy farmers. The rationale is excellent as long as the affected parties are adequately consulted and that their observations are taken into consideration. It is clear that "incorporation by reference" will lead to a reduction in the period of time required for modifying relevant regulations. However, this new approach needs to be monitored very carefully by all parties involved.

Another concept introduced in Bill C-18 is the notion of "preventive control plans". Over the last few decades, agricultural producers and the food industry have developed, with government support, food safety programs grounded on a series of principles based on hazard analysis and critical control points generally called HACCP. The Canadian food safety system rests on this basis. The concept of "preventive control plans" deals with sensitivities new to producers and require careful discussions. Producers are concerned that they will be required to implement "preventive control plans". They need clarifications.

For example, the on-farm food safety program for dairy is named Canadian Quality Milk. It is evolving as a component of an integrated national program involving milk quality, food safety, animal welfare, animal health including biosecurity along with the different aspects of sustainability including its three pillars namely economic, societal and environmental. Producers are concerned that changing the basis of on-farm food safety programs may affect our national program named "proAction".

In conclusion, the process and criteria needs to be clearly communicated. Producers need to see written evidence demonstrating our on-farm food safety programs would be sufficient to meet the requirements of the "preventive control plan". Producers are asking for producer-specific information from CFIA on the issues raised above.

