March 17, 2020

Honourable Marie-Claude Bibeau
Minister of Agriculture and Agri-Food
House of Commons
Ottawa, ON K1A 0A6

Dear Minister Bibeau,

On behalf of the members of the Animal Nutrition Association of Canada (ANAC), we would like to commend the Canadian government for the measures taken in relation to the COVID-19 pandemic to help ensure Canadians stay safe and healthy. With any emergency situation, the impacts are often felt by all, including the entire agricultural value chain which encompasses the feed industry. We wish to share with you the concerns of the feed industry related to possible future measures that might be considered by the Canadian government related to COVID-19 as well as the anticipated impacts the pandemic could have on feeding Canada’s livestock.

ANAC is the national trade association of the livestock and poultry feed industry. The feed industry is a key component of Canada’s agri-food economy and an active partner in the nation’s food safety system. Our 170 members include feed and ingredient manufacturers and distributors, as well as suppliers of a wide range of goods and services to the feed industry. Taken together, ANAC’s membership represents 90 percent of commercial feed manufactured in Canada.

Having the ability to provide sufficient feed to producers to feed their livestock is top priority for our industry and must continue to be possible during the pandemic. Having access to enough ingredients to manufacture feed is vital, without which the outcome would be detrimental to animal welfare.

Imports
The Canadian feed industry relies heavily on the imports of feed ingredients from Asia, Europe and the United States. This includes minerals and vitamins as well other additives such as amino acids, which are critical building blocks in livestock diets. Keeping borders open to global feed ingredient imports during this pandemic is essential.

Transportation
The Canadian and United States agricultural supply chains are closely integrated. Grains and oilseeds as well as their associated meals from the United States represent an important source of raw materials for the manufacture of animal feeds. Due to limited storage capacity in feed mills, especially for grains and oilseeds and their associated meals, the feed industry relies on just-in-time delivery of these bulk products. The continuous flow of transport trucks and drivers as well as rail cars across the Canada-United States border to deliver feed ingredients to Canadian feed mills is critical. Any bans on trucks coming into Canada from the United States and vice versa would have a catastrophic impact on the Canadian livestock sector.
Within Canada, the continuous reliable operation of rail and trucking infrastructure is of utmost importance. The feed industry relies heavily on daily deliveries to commercial feed mills to have enough inputs to manufacture the volume of feed required by Canadian livestock. Any bans on movement and delivery of bulk or bagged feed ingredients within the country would be widely felt and almost certainly result in the closure of feed mills.

**Ingredient shortages**

With the COVID-19 crisis and the reverberations on the global supply chain, the feed industry is preparing for a shortage in feed ingredients in the near future. The closures of factories and ports in China are slowly starting to be felt in Canada and the effects are expected to last for several months beyond the end of the pandemic. To this effect, ANAC is working closely with feed ingredient suppliers and nutritionists to monitor the situation closely and prepare for a worst-case scenario.

If the anticipated shortages for the feed industry materialize, our industry will need the Canadian government’s support to quickly put in place an interim policy to allow for commercial feed manufacturers to formulate feeds below legislated requirements (*Feeds Regulations*, Table 4) without the need for registration. We have alerted the Animal Feed Division of the Canadian Food Inspection Agency of this possibility and will continue to brief them as more information becomes available.

Thank you for the opportunity to voice our concerns during this very difficult time. The health and safety of all Canadians are a top priority for all. We look forward to further conversations and collaboration with the government on how we can continue to provide safe and nutritious feed to Canadian livestock while keeping Canadians safe. I remain at your disposal for further discussion.

Sincerely,

Melissa Dumont, agr.
Executive Director
Animal Nutrition Association of Canada

Cc: The Right Honourable Justin Trudeau, Prime Minister of Canada
The Honourable Chrystia Freeland, Deputy Prime Minister of Canada
The Honourable Bill Blair, Minister of Public Safety
The Honourable Marc Garneau, Minister of Transport
The Honourable Patty Hajdu, Minister of Health
Chris Forbes, Deputy Minister, Agriculture and Agri-Food Canada
Dr. Siddika Mithani, President, Canadian Food Inspection Agency