



# **Premises Identification Regulation Consultation**

## **What We Heard Summary Report**

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## Contents

<b>Background</b> .....	<b>3</b>
<b>Consultation Process</b> .....	<b>3</b>
<b>Who did we hear from?</b> .....	<b>4</b>
Industry Organizations .....	4
Federal Agencies and Responsible Administrators.....	4
Public Email Submissions .....	4
Online Survey Responses .....	4
<b>What Did We Hear?</b> .....	<b>7</b>
Benefits of Premises ID Regulation.....	7
Improved Natural Disaster Response .....	7
Improved Animal Disease Response .....	8
Operation size .....	8
Preparing for Climate Change .....	8
Improved Traceability .....	9
Premises ID Regulation Considerations .....	9
Lack of awareness about Premises ID.....	9
Regulation overload .....	9
Suspicion of future costs.....	9
The role of government in farming.....	9
Privacy and Information Management.....	9
Operation Size.....	10
<b>Concluding Comments</b> .....	<b>10</b>
<b>Quick Facts: Premises Identification</b> .....	<b>11</b>

### Background

The Ministry of Agriculture, Food and Fisheries (MAFF) has offered voluntary premises identification (ID) registration at no cost since 2011 and introduced a new user-friendly online registration system in 2016 ([BCPID Online](#)). Although support is growing for premises ID among B.C.'s livestock and poultry industries, particularly those affected by disease outbreaks and wildfires in recent years, only an estimated 65% of livestock and poultry premises have been registered with MAFF to date. The persistent gaps in information about where animals are located on the land base continues to limit the ability of government agencies and industry to respond quickly to disease and natural disaster emergencies, reduces the chances that livestock and poultry industries can continue operating during emergencies and puts Canada's traceability system at risk.

In 2019, MAFF sought public feedback on the proposed introduction of a premises identification (ID) regulation under the *B.C. Animal Health Act*. The proposed regulation would require individuals with livestock and poultry in their care to register all sites where the animals are raised, kept, assembled or disposed of, temporarily or permanently, with MAFF's [Premises ID Program](#). This report summarizes feedback received from the public, government agencies and industry organizations during the public consultation process.

### Consultation Process

In 2019, MAFF conducted outreach and consultation with industry to gather input on a range of issues related to the proposed premises ID regulation including:

- the role and value of premises ID for emergency response and traceability in B.C.;
- what animal species and operation types to include in the regulation;
- premises ID information management and administration; and
- how to engage industry in implementation.

Major industry associations were directly notified of the proposed regulation via email on July 12, 2019. MAFF staff, Ministry of Forests, Range and Natural Resource Operations and Rural Development Range Branch staff, federal agencies (Canadian Food Inspection Agency [CFIA], Agriculture and Agri-Food Canada [AAFC]) and Responsible Administrators<sup>1</sup> (Canadian Cattle Identification Agency [CCIA], PigTRACE) were informed of the proposed regulation via presentations and written communications and asked for feedback and comment.

A [Frequently Asked Questions](#) document and [Discussion Paper](#) were posted publicly on the Premises ID Program [website](#), and links to these documents were widely distributed. Articles regarding the proposed regulation and opportunities for input were published in several industry publications.

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<sup>1</sup> A responsible administrator is an industry-led entity that collects and manages traceability information on behalf of the CFIA. Responsible administrators issue and manage animal ID tags and can receive animal movement reporting information.

## What we Heard – Proposed Premises Identification Regulation Consultation

B.C. residents were invited to provide input on the proposed regulation via phone, mail, email or an online survey. The online survey was open for comment for six weeks (Aug. 30 to Oct. 14, 2019).

### Who did we hear from?

#### Industry Organizations

Five formal letters of support for the proposed regulation were received by MAFF staff from industry organizations representing the beef (BC Cattlemen’s Association), poultry (BC Poultry Association, BC Poultry Association Emergency Operations Center), bison (BC Bison Association) and horse industries (Horse Council of BC). All letters voiced strong support for mandatory premises ID registration in B.C.

#### Federal Agencies and Responsible Administrators

Strong support for mandatory premises ID was communicated via email by representatives of the CFIA, AAFC, CCIA and PigTRACE. Support focused on the importance of premises ID as a pillar of Canada’s national livestock traceability system and as a tool for enabling effective emergency response.

#### Public Email Submissions

A small number of emails (<5) from the public were received by premises ID program staff with general comments regarding the proposed regulation.

#### Online Survey Responses

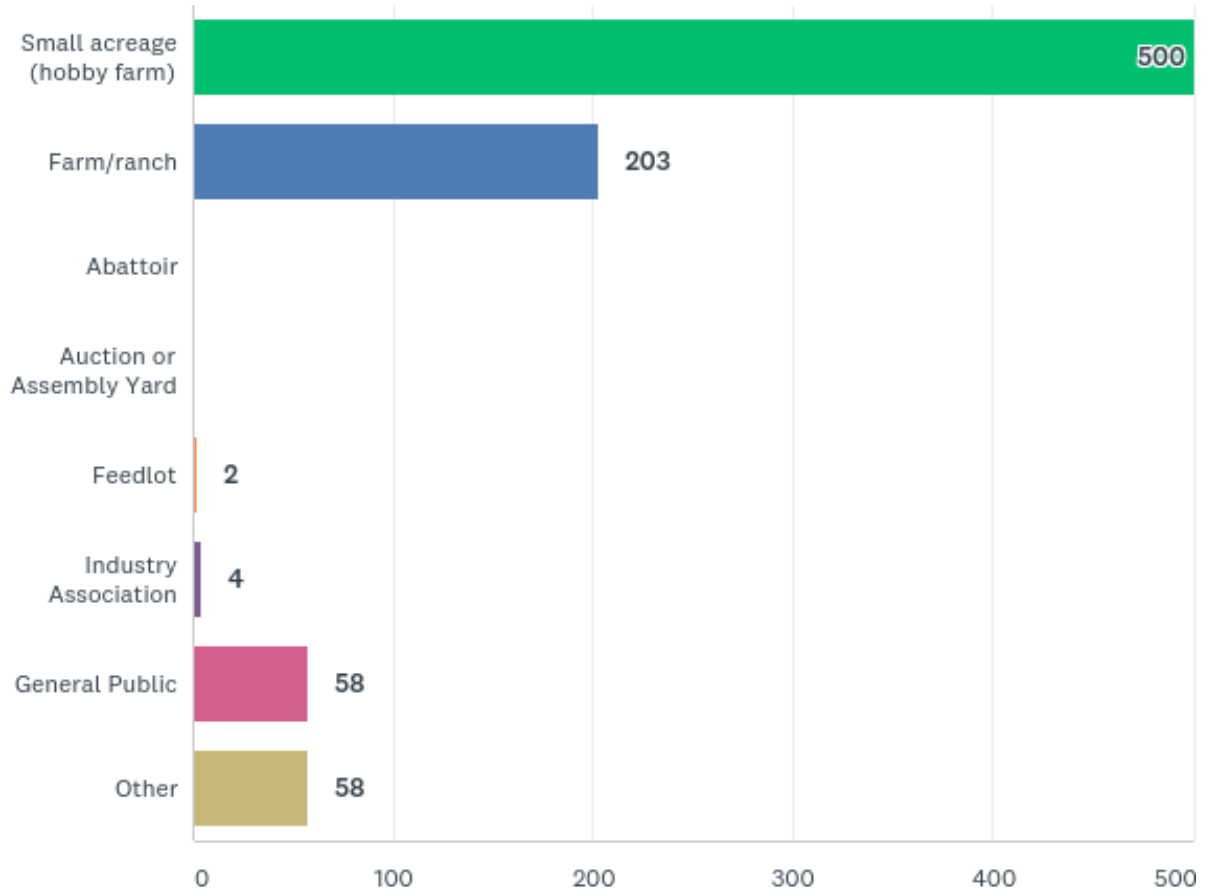
A total of 845 anonymous responses to the online survey were received during the 6-week period (Aug. 30 to Oct. 14, 2019). Not all respondents answered all questions; response rates varied from 75% to 99% for individual questions.

A majority of survey respondents (61%) self-identified as a small acreage/hobby farm (Figure 1). A quarter of respondents self-identified as a farm/ranch (25%). A small number of respondents self-identified as the general public or “other” (7% respectively), and a few respondents self-identified as feedlots (two) and industry associations (four).

Respondents in the “other” category self-identified as:

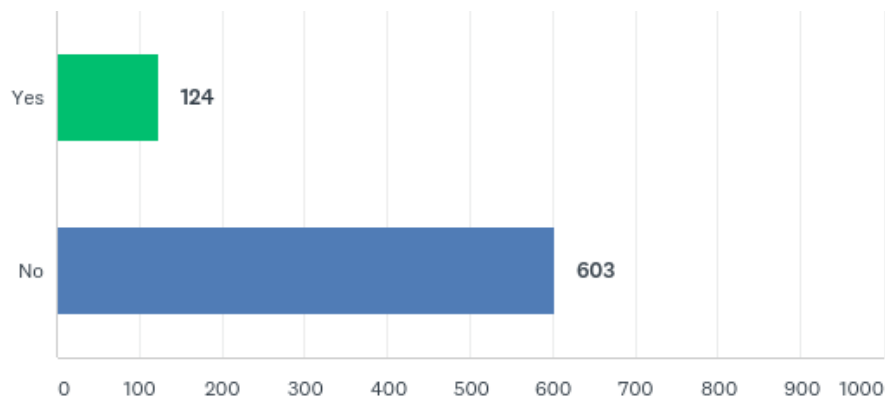
- local government representatives;
- agriculture affiliated organizations;
- backyard producer/market garden/private residence;
- petting farm; and
- horse operations of various kinds (e.g., boarding stable, horse trainer, horse tourism, equestrian center).

## What we Heard – Proposed Premises Identification Regulation Consultation



**Figure 1: Profile of Premises ID Survey Respondents**

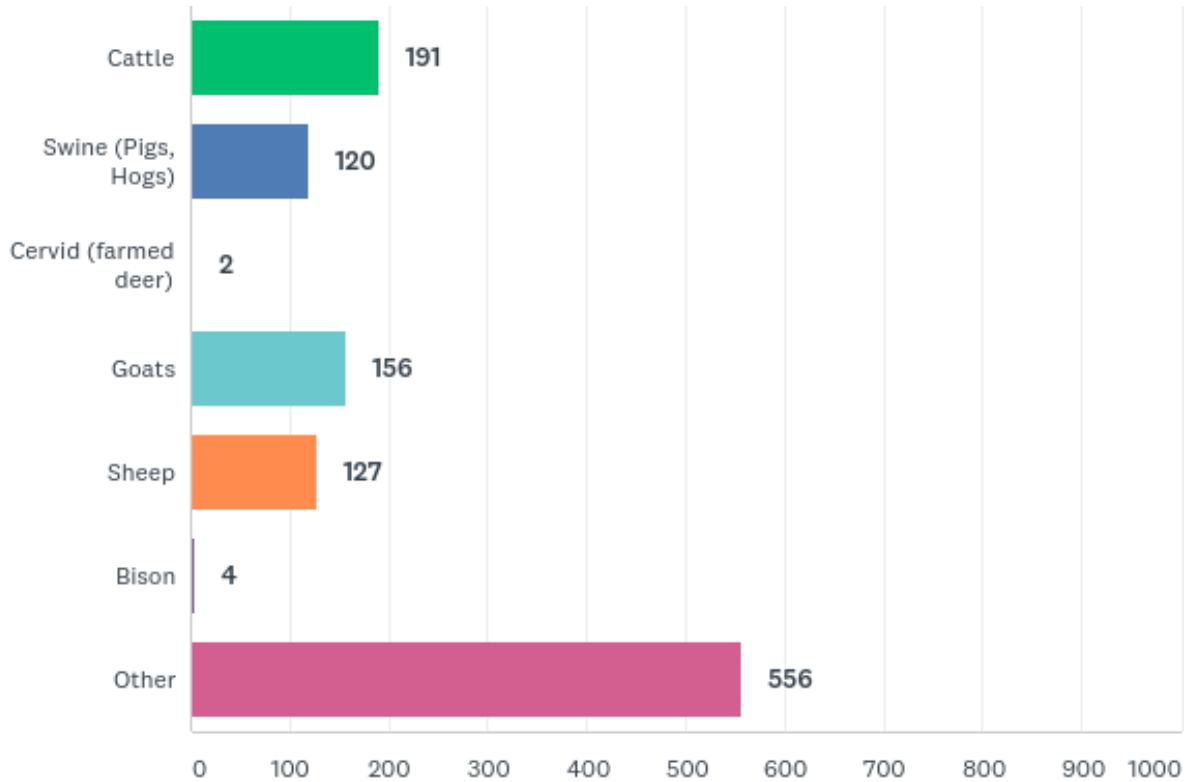
A majority of respondents (757 or 90%) said that they own farm animals or operate a facility where farm animals are present. Of these respondents, most (603 or 83%) are not currently registered with the premises ID program (Figure 2).



**Figure 2: Are you currently registered with the Premises ID Program?**

## What we Heard – Proposed Premises Identification Regulation Consultation

Given that [new traceability regulations have been proposed by the federal government](#), survey respondents were asked whether they had any of the six proposed “federally regulated species”<sup>2</sup> on their premises (Figure 3). Over half of respondents (55%) reported having at least one regulated species while close to a quarter of respondents have multiple regulated species (23%) under their care.



**Figure 3: Respondents reporting ownership of federally “regulated species”.**

A significant number of respondents (556 or 82%) selected the “other” category. When asked for more details, over half of these respondents reported having horses in their care (382 or 57%), and close to half (295 or 44%) have poultry of various kinds. A small number of respondents have emu, ostrich, llama or alpaca.

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<sup>2</sup> The federal government has proposed new traceability requirements for six species (“regulated species”): cattle, bison, sheep, goats, cervid (farmed deer) and swine. National animal ID (tagging) requirements are already in place for regulated species, with the exception of goats. Under proposed federal regulations, all regulated species would be subject to new animal movement reporting requirements which would require reporting the premises ID of origin and destination sites for all animal movements.

## What Did We Hear?

The following section summarizes the main themes that emerged from the public feedback received.

### Benefits of Premises ID Regulation

#### Improved Natural Disaster Response

Many respondents indicated that premises ID information was a critical tool for natural disaster emergency response. Several respondents talked about their direct experience with the 2017 wildfires where premises ID played an important role.

#### ***Supports animal evacuations***

Many respondents recalled specifically how valuable premises ID was as a tool for evacuating animals during the 2017 wildfires. BC Cattlemen's Association has stated that hundreds of animals' lives were saved because of the information provided by the premises ID program.

*"During the 2017 wildfires, premises ID really helped to identify who needed help and what kind."*

One respondent commented that if their farm emergency plan fails or they need additional help during an emergency, they *"will be glad that the government has my information (i.e., knows where their animals are and how many) so that they can provide additional help"*. Similarly, another respondent noted that *"not everyone has trailers for evacuating their animals"* and recounted that their horse was moved three times to escape wildfires around 100 Mile House in 2017.

#### ***Facilitated access to evacuation zones***

To ensure public safety during wildfires or other events, re-entry permitting processes are often put in place by local authorities to limit movement into affected areas. Several respondents recounted that because they had a premises ID, they were more easily able to re-enter evacuation zones to tend to their animals, open up fencing to help animals escape the fires or trailer animals to safer locations. These efforts saved the lives of hundreds of animals.

#### ***Better informed emergency responders***

A few respondents noted that during large disasters, responders often come in from other places and are not familiar with the area, so having maps and information about farm and livestock locations at their fingertips is critical. One person recalled firefighters using maps to go back into fire-affected areas to feed animals left behind.

#### ***Reduced impact on government resources***

Several respondents emphasized that natural disaster emergencies are very costly and it is important to use as many tools as possible to reduce the impact on government resources during emergencies – premises ID was identified as an important tool that makes emergency response more efficient and cost-effective.

### Improved Animal Disease Response

Many respondents talked about how important premises ID was to prevent the spread of animal diseases, and how critical it is to contain diseases quickly and efficiently to reduce impacts on the health and welfare of animals, producers and markets.

*“The faster an animal disease is isolated, or an emergency is managed, the sooner life gets back to normal for everyone.”*

### Animal health and welfare

Several respondents noted their personal connection to their animals, and how important the health and welfare of their animals is to them. They noted that premises ID could be one way to reduce risks to their animals during a disease emergency and felt that it was very important for all animals to be accounted for so that threats could be better managed.

*“Animals being accounted for is a good thing for them”*

### Certainty of farm location

One industry association highlighted how important it is to know exact locations of farms and animals. Addresses in rural areas can sometimes be very similar to one another or may not be accurate enough to locate where animals are physically located. Poultry industry respondents noted that this kind of confusion was one of the key reasons that the Avian Influenza outbreak in 2004 was so devastating, and why all regulated poultry operators are now required to have a premises ID number.

*“There is absolutely no uncertainty about a farm’s location when a premises ID is used.”*

### Ability to continue operating

Accurate knowledge of where operations are located in relation to affected premises can enable a faster and more targeted response that doesn’t cripple an entire industry. Several respondents had direct experience with the Avian Influenza outbreaks in B.C. and noted that because premises ID provided high quality location information, farms within the risk zones could easily be identified and unaffected farms could continue operating. This greatly minimized the economic and personal impact of the 2014 Avian Influenza outbreak.

### Operation size

Numerous survey respondents and all industry organizations that submitted letters of support noted that disease and natural disasters can affect any animal and any farm regardless of size or operation type. Several commercial operators said that unregistered premises posed a serious threat to their operations in which they are heavily invested, both financially and emotionally.

Many small-scale producers said that they did not want their own animals to be at risk of contracting a serious or fatal disease because their neighbours don’t want to register and that all people with animals – from commercial operations to backyard producers – should have to register with premises ID.

### Preparing for Climate Change

Some respondents and government staff noted that a changing climate has the potential to bring new, unforeseen animal diseases to B.C. with unknown consequences. Diseases that have so far been



## What we Heard – Proposed Premises Identification Regulation Consultation

geographically contained and not found in B.C. could begin to migrate, and new diseases never seen before could also emerge.

The severity and frequency of natural disasters is predicted to increase as a result of climate change in the coming years. Several respondents noted how important it is to have strong emergency response systems in place to minimize the impacts of these disasters on their animals and farm operations generally.

### Improved Traceability

Many respondents commented on how important animal traceability is to their business and to the health and welfare of their animals and that implementing mandatory premises ID was an important step towards better animal traceability in B.C.

## Premises ID Regulation Considerations

Survey responses indicate that concern exists among owners of small acreages, hobby farms, backyard producers and individuals keeping farm animals as pets. These views are summarized below.

### Lack of awareness about premises ID

A quarter of survey respondents (25%) stated that they had never heard of the premises ID program. Some comments indicated that education and outreach will be important to raise awareness and acceptance of the program's value and how it operates.

### Regulation overload

Many respondents said that the regulatory environment in which farmers operate is becoming increasingly complex and that the administrative burden on farmers, particularly small farmers, is increasingly difficult to manage. The possibility of a new regulation that might require more administrative time and effort was a concern.

### Suspicion of future costs

Some respondents were concerned that there will be future costs to register or stay registered with the program. Others were concerned that their information would be shared with government agencies and could result in other fees.

### The role of government in farming

A considerable number of respondents voiced general opposition to government regulation and involvement in farming and private affairs. These concerns were not directly related to the proposed premises ID regulation, but a large number of individuals used the survey to share these views.

*"I've been registered with the program for 5 plus years now and have never had any negative interactions with the government because of it"*

### Privacy and Information Management

#### ***Risk of information being used for other purposes***

Many respondents were concerned that their personal information would be shared outside of the program; for example, with other agencies responsible for taxation or property assessment, animal

## What we Heard – Proposed Premises Identification Regulation Consultation

rights groups, or the public. Some voiced concerns that the information would be used to monitor activities on their farm or lead to animal seizures or destruction.

### ***Need to reduce duplication***

In contrast to the previous concern, another large group of respondents stated that premises ID information should be shared more freely between programs and agencies. They noted that government(s) and (or) MAFF has already collected information about their farm business and this information should be shared between programs or agencies to reduce farmers' administrative burden.

### ***Information Leaks or Hacking***

A small group was concerned that the premises ID system was vulnerable to hacking or information leaks, despite being behind government firewalls and being password protected.

### **Operation Size**

Several respondents stated that because they are a small or backyard operation and not a commercial farming operation, they do not believe that they should need to register with the premises ID program. Many of these people indicated that they have only one animal kept as a pet (e.g., a horse), or a small number of animals kept recreationally or for personal consumption (e.g., a pig or a small number of laying hens). Others believed that because their animals are not going to enter the food chain, premises ID requirements shouldn't apply to them.

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## Concluding Comments

Thank you to all individuals and organizations that took the time to provide input regarding the proposed introduction of a premises ID regulation in B.C.

**Quick Facts** about the premises ID program have been included below as a reference for those less familiar with the program.

For more detailed information about the premises ID program, please visit our website:

<http://gov.bc.ca/premisesidprogram>

## Quick Facts: Premises Identification

- Premises ID registration is a **free** core service offered by the ministry and will remain free.
- Premises ID registration takes **less than 10-15 minutes** online, and can also be done by filling in a paper registration form: <http://gov.bc.ca/premisesidprogram>
- Registrants are asked to keep their account information up to date and will receive a reminder to update their account every two years. No additional paperwork is required.
- Premises ID information can only be used or disclosed to plan for or respond to animal disease or emergency events affecting the health of animals due to provisions under the *B.C. Animal Health Act*. It cannot be shared for other purposes with other agencies or programs.

Since the program started, Premises ID information has been used to inform emergency response related to the following events affecting livestock or poultry:

### Animal Diseases

2013/14	Hatching Egg Disease Investigation (poultry)
2009, 2014/15	Avian Influenza (poultry)
2015	Dairy Cattle Parasite Risk Identification (cattle)
2015, 2017, 2018, 2019	Infectious laryngotracheitis (ILT) (poultry)
2017	Salmonella (poultry)
2018/19	Bovine Tuberculosis (cattle)
2020	Blackhead (turkey)

### Natural Disasters

2015, 2017, 2018	Wildfires
2017, 2018, 2019	Floods, Fraser River Freshet
2015, 2018, 2019	Drought

### Environmental Pollution

2012	Lickman Road Substation Fire (Chilliwack)
2013	Lemon Creek Fuel Spill (Slocan Valley)
2015	Masonville Plastics Fire (Surrey)
2017	Anderson Creek Fuel Spill (Surrey)
2018	Aldergrove Fuel Spill