



June 25, 2024

Darrell Russett
President, Beef Farmers of Hastings County

Dear Darrell,

The following resolution was passed at the Beef Farmers of Ontario (BFO) Annual General Meeting in February and was recently discussed by the BFO Board of Directors:

WHEREAS, Electronic logging devices (ELDs or E-Logs) pose an animal welfare issue in the humane transport of livestock; and
WHEREAS, there is a lack of awareness of the consequences E-Logs have on the beef industry; and
WHEREAS, a resolution concerning the exemption of livestock trucks was put forward last year;
THEREFORE, BE IT RESOLVED THAT BFO put greater emphasis on informing our federal politicians on the animal welfare and industry issues that E-Logs place on transporting our livestock.

The BFO Board of Directors understands and shares your concerns regarding Electronic Logging Devices (ELDs) and their potential impact on animal welfare during transportation. BFO recognizes the significant challenges posed by the Commercial Vehicle Drivers Hours of Service Regulations, and has been actively addressing them with federal and provincial officials.

At the federal level, BFO has been an active participant in the National Working Group – Animal Transport, collaborating with organizations such as the Canadian Cattle Association (CCA), Canadian Livestock Transporters' Alliance, and other provincial and national entities. This group has engaged in discussions with Transport Canada, Agriculture and Agri-Food Canada, and Canadian Food Inspection Agency advocating for regulatory flexibility to ensure that unforeseen delays do not compromise the welfare of livestock during transport. Specifically, we have requested the federal government harmonize Canadian live animal transport regulations with U.S. legislation, which includes an exemption for livestock and insect haulers from hours-of-service regulations within a 150-air-mile radius from the origin and destination of the animals. Such an exemption would provide necessary flexibility for the timely and safe delivery of livestock.

Additionally, CCA and National Cattle Feeders' Association (NCFA) brought forward concerns regarding ELDs' impact on animal welfare from the beef industry to the Standing Committee on Agriculture and Agri-Food (AGRI) during its study on ELDs and their impact on the livestock transportation industry. During their presentations to the committee, they highlighted the impact of the ELD regulations on animal welfare and industry operations. Their advocacy aligns with our efforts, reinforcing the need for regulatory adjustments. From those meetings [AGRI developed a report on ELDs](#) that aligns with industry viewpoints by addressing key concerns and making recommendations that BFO see as positive. The committee acknowledges the operational challenges livestock haulers face and identified the need for more flexible ELD regulations that accommodate industry's unique demands. A notable recommendation was to provide commercial drivers carrying livestock or insects greater flexibility at the beginning and end of their trips to limit compromising animal health or safety, while considering local conditions and distances. This proposed

recommendation would aim to provide added flexibility for livestock haulers when unforeseen circumstances arise, ensuring they can maintain efficiency and compliance without compromising safety. This alignment underscores a collaborative effort to balance regulatory compliance with the practical needs of the industry, promoting both safety and efficiency in agricultural transportation. The government response to the report can be found [here](#).

Following AGRI's recommendations on ELDs, MP Martin Shields introduced Private Members' Bill C-385 An Act to amend the Motor Vehicle Transport Act, which aims to address these concerns. The bill seeks to codify the proposed 240 km exemption at the beginning and end of trips, providing livestock haulers the flexibility to effectively manage unforeseen circumstances. BFO sent a letter of support to MP Shields thanking him for bringing this bill forward and taking action on the recommendations that came out of AGRI's report on ELDs. We offered our support and assistance as the bill works its way through the House. BFO will also be sending a letter to all Ontario MPs regarding the bill, indicating our support and detailing how the bill will strike a balance between animal welfare and road safety.

While the regulations are federal, their enforcement is managed provincially. BFO has met with provincial officials to discuss the grassroots impact these regulations have on the livestock sector. BFO then sent a letter to the provincial Minister of Transportation, outlining our concerns and requested immediate guidance to enforcement officers clearly stating that certain scenarios should be classified as "emergency situations" when dealing with livestock transportation. BFO received a response from the Minister of Transportation regarding this request, which can be found in last year's resolution response, [23-03 on the BFO website](#).

BFO will continue to monitor this issue and push for inclusion of clear and more distinct language around animal welfare in the emergency exemption clauses. We appreciate your engagement and input on this matter and assure you of our continued efforts to safeguard animal welfare during transportation. Thank you again for bringing this resolution forward.

Attached you will find the letter BFO sent to MP Shields supporting his Private Members' Bill C-385 and the letter BFO is sending to all Ontario MPs requesting their support of this bill and ensure its passage within the House of Commons. We will keep you apprised of any updates.

Sincerely,



Craig McLaughlin
President

cc: Paul Kinlin (Advisory Councillor, Seconder)
Al & Marg Govier (Secretary)



May 23, 2024

Martin Shields
Member of Parliament
House of Commons
Ottawa, Ontario K1A 0A6
Email: Martin.Shields@parl.gc.ca

Re: Bill C-385 An Act to Amend the Motor Vehicle Transport Act – Electronic Logging Devices

Dear Mr. Shields,

On behalf of the 19,000 members that the Beef Farmers of Ontario (BFO) represent, we would like to thank you for bringing forward the Private Member's Bill, C-385 *An Act to Amend the Motor Vehicle Transport Act – Electronic Logging Devices (ELDs)* that was introduced on March 19, 2024. We are strongly supportive of this bill and believe it provides a common-sense approach to address some of the concerns and unique needs the livestock sector has raised in regards to the humane transportation of livestock in Canada.

If passed, this bill would work to harmonize the Canadian approach with our U.S. neighbours, striking an appropriate balance between ELD allotted hours-of-service and the humane transportation of livestock. Given the inherently integrated nature of our North American cattle and beef supply chain, this would represent a very positive improvement for our sector.

BFO commends you on taking action from the recommendations found in the report from the Standing Committee on Agriculture and Agri-Food (AGRI) titled: *Striking A Balance: Electronic Logging Device Requirements Impacting Animal Transportation*, specifically the second recommendation. In our view, the AGRI Committee conducted a thorough study of this issue, something that policymakers should take into strong consideration as the bill progresses through various stages of debate.

The issue of humane livestock transportation and e-logs is complex, as showcased within the committee report. BFO believes that the 240-km radius of the point of origin and destination of the journey would provide the needed flexibility to reach destinations safely without jeopardizing the health and wellbeing of either the drivers or the animals in transit.

Unlike other goods transported in Canada, livestock have unique needs. Trucks with live cargo simply cannot stop anywhere for rest periods, and there are very few livestock rest stations in Canada. Requiring a driver and their livestock loads to stop in non-livestock rest areas when they are in close proximity to their destination only increases the risk of poor animal welfare outcomes, something that could be avoided with the passing of this bill.

The Ontario beef sector is particularly sensitive to this issue given the frequency and volume of long-haul shipments of cattle from western Canada into southern Ontario, a critical component of the Canadian beef sector for both Ontario producers and western Canadian cattle sellers. A workable solution to the existing regulatory requirements and their limitations, like what you have suggested in Bill C-385, strikes the best balance in our view.

BFO will be encouraging Ontario MPs to support this bill, and should this bill make it to the committee stage, we would be pleased to appear before the committee to discuss its merits and impact on our sector.

Mr. Shields, thank you again for putting forward Bill C-385.

Sincerely,

A handwritten signature in black ink that reads "Craig McLaughlin". The signature is written in a cursive, flowing style.

Craig McLaughlin
President