



Getting Traceability Right: Issues and Solutions

Submitted by Western Stock Growers' Association

March 16, 2026

The Canadian Food Inspection Agency (CFIA) has proposed enhanced livestock traceability regulations that would significantly expand the obligations placed on cattle producers across Canada. While the federal government and other proponents of the proposed regulations maintain that enhanced traceability will strengthen Canada's ability to respond to disease outbreaks and protect market access, producers — particularly those in the cow/calf sector — have raised serious and wide-ranging concerns about the costs, practicality, and implications of these new measures. The following document outlines key issues identified through extensive producer consultation and membership polling conducted by the Western Stock Growers' Association (WSGA), along with proposed solutions that reflect the priorities and realities of the ranching community.

Everyone is aware of the value and role of traceability to the industry – that is not what is under question. While producers recognize the importance of traceability in supporting animal health, disease response, and market confidence, the current proposed changes place disproportionate costs, risks, and administrative burdens on the cow/calf sector without clear evidence of corresponding benefits. This document highlights the operational, economic, technological, and governance issues associated with the proposed changes and presents recommendations for strengthening traceability in a way that maintains producer trust, industry competitiveness, and the long-term sustainability of Canada's cattle sector.

The WSGA membership, as well as cow/calf producers across Alberta and beyond, is unequivocal in its position: the proposed regulations as currently designed are not acceptable and should not proceed. Producers are not opposed to improving livestock traceability in Canada — they are opposed to a flawed, costly, and premature regulatory framework that has failed to earn their trust or demonstrate its value. The solutions presented in this document reflect a genuine commitment to strengthening the existing system through practical improvements that work for producers.

1. Cost and liabilities pushed to the cow/calf sector: Producers ultimately shoulder the costs of a traceability system. Costs incurred downstream are pushed upstream to the price taker which is the producer. Ultimately liability for a disease outbreak may also be pushed to the producer. If a disease occurs on a producer's place, will they be held liable and accountable?

Solutions:

- Demonstrate a **benefit** to the consumer outweighing the liability and implementation costs. CFIA has not adequately done so.
- Clearly show what the estimated value to trade or reduction in tracing times mean to a rancher. This needs to be explained better to earn trust.
- Assurance of no liability to the producer of an infected herd and full support in the event of a disease outbreak or herd liquidation.



- Assurance that all costs will be covered in a disease or herd reduction event. In the TB investigation, only partial costs were covered.

2. Cost of implementation: Most ranchers don't own a wand reader. Their obligation under the current system is to ensure the cattle have a tag before they leave the ranch. They are not obligated to read EID's currently. The new regulations are a steep change for them. Now, on move in day, they are forced to run cattle through the chutes and to be able to read individual tags and use computers to upload information within 7 days. Two thirds of the industry are 60 years old or older and this may be beyond their technical capabilities. They may have to hire technical support. There are added costs of running cattle through chutes in terms of weight loss, extra labour costs, injury (both cattle and human), wand readers, time assembling and uploading data. When you run cows and calves through the chute, they must be separated and run through independently. It takes time and manpower; the calves are weaned during this period which adds stress to the animals. Additional labour must be hired in many cases. These are annual costs that equal far beyond \$130 per operation.

Solutions:

- Realistic cost/benefit analysis that proves that the new traceability measures rewards are going to be worth the costs.
- The following costs should be included in the cost/benefit analysis to get a more complete picture: running animals through a chute, shrinkage, time delays because of the extra animal handling, extra labour requirements, death loss/injury, and costs if diseases are found. Some of this information should be available from other countries that have set precedence.
- Wand readers that upload automatically to the producers' computers might be a partial solution.
- Robust benchmarking needs to be undertaken. We have not been presented with a benchmark analysis on traceability. Information from other countries with similar programs that are being proposed should be able to show what the reward is and the costs.
- Our tag system is essentially 1950's technology. High frequency tags where cattle can be read without going through a chute such as off truck, on truck, running down an alley or through a gate would be preferred. CCIA gave up on researching that technology. Maybe the bolus system could be workable. Research is needed.

3. Cost, speed focus when the border will close anyways. In a health issue, the border will likely close for at least 90 days anyway. Reducing the speed of disease tracing won't have a huge impact. The idea of regionalizing disease outbreaks is good and can be done within the existing system using a combined livestock inspection and current traceability standards. This can also be tightened up with e-manifests.



Solutions:

- Continue to strengthen and harmonize existing inspection systems and national traceability systems to have a robust double protection system (manifest and EID). The TB investigations proved this point.
- Continue to support voluntary traceability systems that increase speed of trace out.
- Encourage feedlots/packers to share data to incentivize more active tag use by producers.

- 4. Competitiveness:** Who is asking for these measures? Why escalate our measures when the US doesn't even have a national EID system let alone a traceability system? We are adding layers of cost that further renders us uncompetitive. There are no proven cost/benefits, impact assessments or benchmarking of other systems that have been done from a competitiveness standpoint.

Solutions:

- Cost benefit analysis of whether getting the last 5% traceability improvement is going to make us more competitive or is simply a "nice to have".
- Benchmarking and comparison of global systems.
- Prove that global customers or regulators are requesting this.
- Reduce regulatory burden to keep us competitive, not increase it. Look at the SRM and OTM discount costs we have been carrying since BSE. These programs have outlived their usefulness.

- 5. Overstepping the brand inspection and manifest system:** The new traceability system over steps LIS and LSS which have demonstrated for many years their ability to maintain and track inventory including our exports. Manifests trace cattle within a week, e-manifests could shorten that more. CFIA is running over 30 days in their tracing efforts. Producers created and trust brand inspection systems. The double defense system is more robust than an EID system alone where tags can be lost, cut out, or don't function. The brand and paper trails have been the ultimate identifier in previous health events like TB. The paper manifest and "CAN" brand are the preferred method of cross border tracking with the US, not our EID system.

Solutions:

- All systems must coordinate with our brand inspection services and manifest system and also support the transition to the e-manifest system.
- Harmonization of livestock inspection from province to province. Getting other provinces up to speed with their own livestock inspection services so we have a proper "paper" backup system to the CCIA system – double defense.
- Run a pilot to trial proposed enhanced CFIA system in provinces with no livestock inspection programs in place. Then compare it to our combined system. Give us a business case to demonstrate why the CFIA EID system is better than our current combined system.



6. Producers are not willing to move towards a European model of high traceability:

Producers are aware of language coming out of the UN. They see the ISSB standards and the CSSB standards coming down the line that value environment over food which is a detriment to food security. They see cattle liquidations in Europe and methane taxes discussed. Mark Carney's GFANZ proposals for a "race to zero" and Europe's 55% emissions reductions focused in large part on livestock is not acceptable to the Canadian beef industry. They have heard from Canada Health that red meat is a carcinogen as bad as cigarettes. When the government can identify your cows, they can regulate your cows. Producers don't want to go down that road or have any more red tape. These are valid 'slippery slope' concerns as we see agricultural producers being regulated into bankruptcy in other areas of the world. If producers allow this, it won't stop here. It will be escalated further based on the same reasoning of 'why shouldn't we improve traceability?' Mandated individual traceability, passport systems, using the traceability system to regulate inventories or count carbon emissions are all waiting in the wings. These are what producers are worrying about. Historical evidence and case study supports this concern.

Solutions:

- Start building trust by designing a traceability program that is industry led and protects against traceability being weaponized for further regulation, red tape and increased regulatory costs.

7. Trust: Ranchers have lost all confidence in CFIA. They want change. They don't know who directs CFIA and how they are governed. CFIA has botched several things now (Ostrich killing, TB investigations, the roll out of these new regulations, and general trust with the industry) and proven to be out of touch with industry realities. There is a VOTE OF NONCONFIDENCE IN CFIA by our cow/calf industry.

Solutions:

- Move CFIA from federal Ministry of Health to the Ministry of Agriculture.
- Proper producer representation and agricultural knowledge within CFIA positions - including the management board and executive directors of the animal health regulatory program as well as the Senior Management Committee.
- Transparency of where CFIA gets their directives from. Is it all WOA or is it the WHO? UN driven agendas, ISSB standards, or is it Canadian cattle industry driven agendas?
- CFIA needs to show up to producer meetings, it is an insult when they don't



8. Success of the system: Tag retention issues, flaws in the CLTS and CCIA system right now have not been addressed. This also includes duplicate tags, stale tags, reused CCIA tags and lost tags on the premises. CCIA is unaware of its error rate on the CLTS system and has not analyzed it. An annual ten percent tag loss due to retention issues, further adds to the inaccuracy of the current system.

Solutions:

- Calculate the error rate. CCIA was asked about this and admitted they didn't know the error rate. Undertake a third-party review of the accuracy of the data in our current system.
- Perform a risk and robustness analysis of the CLTS system to understand the process for dealing with producer entry error or failed user entries. There are many question marks here and opportunities to improve our traceability system.

9. Wildlife Disease Management: Effective livestock traceability must be considered within the broader disease ecology of working landscapes. In many regions of Canada, cattle operations coexist with significant wildlife populations that regularly move across grazing leases, private ranches, and public lands. These wildlife populations are not subject to traceability systems, yet they can act as reservoirs or vectors for disease.

If wildlife populations can move freely between operations without monitoring, disease management cannot rely solely on traceability requirements imposed on cattle producers. A traceability system that does not account for unmanaged wildlife vectors risks placing regulatory burden on producers while leaving a significant component of disease transmission unaddressed.

Solutions

- Enable producers to participate more actively in the management and monitoring of wildlife populations that interact with livestock operations. Providing ranchers with practical authority and tools to manage wildlife presence on working landscapes can improve compliance and strengthen disease prevention outcomes.
- Develop and implement comprehensive wildlife disease monitoring and response plans in areas where wildlife and livestock populations interact. Strengthening wildlife surveillance and management should occur prior to expanding traceability requirements for cattle producers to ensure that disease prevention strategies address all potential transmission pathways.



10. Compliance: The strength of a traceability system is about compliance more so than speed. There is 90% compliance today with the existing system. The new proposed measures could push compliance as low as under 50%. Fines and fees would be imposed on producers to enforce compliance, which would agitate ranchers further and create even less compliance. Most of the industry has less than 50 head. These producers are unlikely to have wand readers. They will not comply or will exit the business, and the Canadian herd will further shrink, driving up the cost of beef further. Acreages will be ungrazed, fire hazards will increase on small acreages without cows, increasing disaster insurance costs. Fire hazards will also increase on land that is not suitable for conversion to cropland. The ecological diversity will suffer both on the converted lands and idle grasslands.

Ranchers need to see a benefit before they comply. They have complied with VBP, CRSB, Trustbix, CCIA traceability and have seen little to no financial benefit or reward for having done so. Only time spent and added costs and burdens. CLTS came out in 2002, BSE hit in 2003 and closed the border for two full years with a working traceability system. Experiential knowledge is at cross purposes with instituting enhanced traceability programs.

Solutions:

- A clear depiction, case study and/or sourced data that clearly outline the benefits of an enhanced system over the current system will be integral to having producer approval. It needs to be demonstrated why these enhancements are not going to be the same as many previous programs that have promised benefits but not delivered.

11. Technology: EID tags are modelled after old 1950's technology and have not changed since the dangle tags with bar codes were moved to EID's 25+ years ago. Ranchers need user friendly solutions that can survive outdoors with extreme temperatures and terrain. There is an estimated 10% tag loss **annually**, making tag retention a major issue and the data the system produces unreliable from the start. An upgraded traceability program will be cumbersome with present technology.

Solutions:

- UHF tags where cattle don't need to be run through chutes to be read; tags that can be read on the truck or when running down an alley or through a gate. CCIA gave up on this technology and has not revisited it due to retention and readability issues. We need technology like this at the cow/calf level.
- Bolus ID's that don't require ranchers to read them is an idea to explore.
- Technical support from CCIA when the technology does not work. Wand readers that automatically update the data to a chute-side computer.
- Halt implementation of new measures until it is proven to be necessary to operate in the world market.



12. Ownership/access of data and value of data: Packers are not forced to reveal their margins in Canada or reveal slaughter data. Feedlots are withholding feeding data from producers. Traceability measures from rancher to packer have been blocked by feedlots and packers withholding data. Cow/calf producers are blind to how their cattle perform beyond the ranch if they are not able to retain ownership. Ranchers should not be expected to freely reveal their inventory and movement data and accept liability for disease outbreaks.

Asking producers to blindly input data without very clearly addressing access concerns and data usage concerns is going beyond what producers are willing to do.

Solutions:

- Producers would be the sole owners and holders of their data, only releasing it to CFIA or RCMP on an as needed basis in a disease emergence. Rules for release of that data would be required stating exactly what information would have to be given and under what circumstances.
- Hard rules around who has access to data and data security are necessary. This would not be required if the data stays with the producer. CFIA has no need to access this information outside of a legitimate traceback.
- A guarantee of what data will be used for.
- Implementation of a voluntary system where ranchers can access ranch to plant data or get value for their data will be more effective than a forced compliance system for disease traceability measures alone.

13. Red tape and added regulation: Ranchers have had enough. VBP, public access on lease lands, lack of industry support from the Federal Government, villainized by anti-cattle agendas from entities our country supports such as ISSB, WEF, UN and others calling for cattle reductions. Producers are saying “No More”.

Solutions:

- Cost benefit report to show that this is worth the effort for producers to pursue. With trust lost, words don’t work anymore. Proof is necessary.
- Reduce red tape, not increase it. Make it easier, not harder. Producer push back shows that they have hit the wall.
- Build trust back.

The points above are a result of extensive producer discussions and membership polling. Our members have been very active in their response to this, so we are extremely confident we are relaying the concerns and views of the WSGA membership.



At the end of the day, producers are being asked to accept increased regulatory, administrative, and operational burden to ‘enhance’ a flawed system. There are so many improvements that can be done within the current system that would be considered enhancements and can be marketed in trade discussions. The way forward to an improved traceability system isn’t to add more regulations to an already overregulated anchor of an industry but to make improvements within the current system until it is accurate, efficient, and reflects the realities of the industry it is meant to protect. Once those improvements have been implemented successfully, then and only then, should producers be approached to do more.

Thank you for your attention, we hope to continue the discussion and hope that these issues and solutions may be of use in maintaining dialog.

Regards,

A handwritten signature in blue ink, appearing to read 'R. Copithorne'.

Ryan Copithorne, President
Western Stock Growers’ Association

A handwritten signature in black ink, appearing to read 'Lindsay Murfin'.

Lindsay Murfin, General Manager
Western Stock Growers’ Association