

Age Verification

Background

Alberta's *Traceability Cattle Identification Regulation* mandates that all cattle born as of January 1, 2009 must be identified with a CCIA radio frequency identification (RFID) tag before 10 months of age or prior to leaving the farm of origin. Cow-calf producers purchase tags from authorized dealers, tag their cattle, and then input birth dates associated with each tag number into the *Canadian Livestock Tracking System (CLTS)* maintained by the Canadian Cattle Identification Agency (CCIA).

Canadian Food Inspection Agency (CFIA) regulations require that beef processors have procedures in place to keep separate throughout the slaughter process cattle under thirty months of age (UTM) from cattle over thirty months of age (OTM). This requirement is in *Annex D: Specified Risk Materials*, which also specifies how the age of cattle is determined:

"For the purposes of this policy, the age of cattle can be established by using reliable documentation that indicates the birth date of the animal or by examining the teeth. The birth date document, rather than dentition, provides the best means for determining the age of cattle. When documentation is available it shall be used as the primary means of determining the age of animals."

(Annex D: Specified Risk Materials, Section 2.1)

In practice, this means that an ear tag (and its corresponding birth date held within the *Canadian Livestock Tracking System*) takes precedence over dentition when determining the age of cattle in beef processing plants. Only when such documentation is unavailable (e.g., the tag is defective, the animal has no corresponding data within CLTS) will age be determined by examining teeth.

Problems with this process can and do emerge. For example, mistakes can be made when entering birth data into CLTS. Sometimes, producers will first input birth dates for a group of tags, and will then tag their cattle. If all the tags are not required, they may be saved for use the following year. However, those tags have already been associated with a birth date in CLTS. If they are used the following year, those cattle will "read" incorrectly—being a year older than they really are. Such mistakes are not always evident when cattle are processed into the feedlot. When the cattle arrive at the plant for processing, they "read" OTM when they are actually UTM. Because "tag trumps teeth" cattle feeders suffer a discount.

Guiding Principle

Age-verification can generate benefits to the beef industry. However, these benefits only accrue if the age verification system—its processes, procedures, and practices—incorporates accountability and is cost-effective. As such, system integrity is a must if all sectors of the beef value chain are to realize benefits from age verification.

Position

ACFA believes that a properly functioning system of age verification can help mitigate against the spread of disease and facilitate more thorough and timely disease investigation and response. Age verification also builds trust and helps meet the growing demands of consumers domestically and in export markets. At the same time, there is little to no accountability within the current system to prevent errors, and cattle feeders are paying the effective penalty for errors made elsewhere through discounts on fed cattle that have been misaged. ACFA believes that changes to government regulations are required to restore system integrity. If positive reforms cannot be secured, then age verification should not be mandatory.

Actions

- ACFA will work through NCFCA to secure a regulatory change in Section 2.1 of Annex D. This change would specify that when a tag reads OTM, the teeth of the animal should be examined to confirm the OTM finding. If the teeth indicate that the animal is UTM and not OTM, then the results of dentition will be accepted over the reading produced by the tag. This process will start through a formal submission made by NCFCA to the Canadian Food Inspection Agency.

- ACFA will advocate with the provincial government to identify and implement mechanisms that could improve compliance with the age verification regulation, including the potential establishment of various enforcement provisions for producers that improperly tag and age verify their animals.
- ACFA will work with BIXS and support efforts of the CCIA to educate producers on age verification, and implement digital technologies and online database management tools that will prevent producers from entering erroneous data that compromises the integrity of the CLTS database.
- If improvements in the system of age verification cannot be secured, ACFA will consider withdrawing support for age verification and advocate that the system no longer be mandatory.

Key Messages

- *Mandatory age verification can only provide benefits if the system incorporates accountability and system integrity is maintained. Currently, the system is not working and cattle feeders are being penalized.*
- *Changes to government regulations are required to ensure accountability and compliance, and to restore integrity to the age verification system.*
- *If positive reforms cannot be secured, age verification should not be mandatory.*

Approved by the Board on: May 25, 2016

Subject to Review by: May 25, 2018