

**Ontario Independent Meat Processors Association**  
**Meat Review Presentation to Justice Haines - March 31, 2004 - London, ON**

Good Morning Justice Haines, On behalf of our members and our industry thank you for allowing us the opportunity to make a presentation to you today. We appreciate your thoroughness in conducting this review and that you have taken the time to visit meat processing facilities.

My name is Laurie Nicol, I am the Executive Director of the Ontario Independent Meat Processors (OIMP). I have been with the association for the past 19 years. OIMP is a non-profit organization currently representing the interests of 118 of Ontario's meat and poultry processors, retailers, and wholesalers operating under the various legislative jurisdictions. I won't spend a great deal of time on who is the OIMP is and what we do, as you had the opportunity to attend our annual meeting and have spoken with members. I will say the OIMP is recognized as the organization representing the industry and we work closely with government, agricultural, and commodity organizations on issues affecting our industry. Membership in the OIMP is voluntary.

In Ontario, there are over 2,000 businesses involved in the meat and poultry industry employing over 18,500 people. These businesses are operating under three distinct food safety legislations. Federally regulated and provincially licensed abattoirs must adhere to the rules contained in their respective inspection regulations of which the food safety standards are science based and equivalent in nature. Both systems are overseen by veterinarians, inspectors, and laboratory support programs. The interpretation of the food safety standards under which the municipal processors operate appears fragmented. The average consumer is unaware there are federal, provincial, and municipal inspection standards and only want to know that the food they are consuming will not cause them harm or illness.

85 per cent of the animals in Ontario are slaughtered in 25 plants operating under federal inspection. The meat products from these establishments can be exported. These establishments are required to meet the food safety criteria of the importing country. The remaining 15 per cent of the animals slaughtered comes from approximately 190 abattoirs that are licensed and inspected by the provinces Food Inspection Branch. Many of these businesses are small, family owned operations employing 1-10 people. These businesses are providing a necessary service to Ontario's 30,000 farmers and are key contributors to their local economies.

In addition to processing Ontario's cattle, hogs, chickens, and turkeys, these companies handle many niche products such as lamb, veal, BBQ hogs, rabbits, exotic animals, and specialty poultry which in many cases are not processed by federal plants. Provincial plants have been the salvation for farmers in dealing with the backlog of cattle due to the closing of the US border due to BSE (this has represented a 12% increase in provincial slaughter). Provincial plants have played an important role when labour disruptions and plant closures happen in federal plants that stop the movement of animals.

In addition to the provincially licensed and federally registered plants there are over 772 free standing processors operating under the Food Premise Regulation with the local jurisdiction of the 37 health units. Industry feels this number is low with more that have not been identified.

We should never lose sight of the fact that Ontario has a good inspection system and that our industry is committed to providing a safe, wholesome product to the Ontario consumer. Regulations and inspections are only part of a system. Everyone has a role in protecting human health from the farm to the table. Producers are implementing on-farm HACCP Programs; processors are strengthening their food safety programs by implementing HACCP programs and we as consumers need to ensure that our food handling practices are not jeopardizing the safety of the food which we are feeding our families.

We support the need for a harmonization of inspection standards across the country, but do not support a single delivery system for inspection. Meat inspection regulations are currently being developed in Ontario under the Food Safety and Quality Act, 2001, which would replace and build on the current Meat Inspection Act (Ontario) and regulation. These should be outcome based and consistent with the National Meat and Poultry Regulation and Code and impose Good Manufacturing Practices (GMPs). The OIMP was involved on the working committee that developed the National Meat and Poultry Code in 2000, which was primarily based on Ontario's provincial meat regulations.

All systems, whether federal or provincial, need ongoing enhancements. When federal and provincial auditors examined their respective inspection programs, both identified areas for improvements. Companies that do not follow the rules will do so under any inspection program, and programs have systems in place to respond accordingly.

In the past five years OMAF- Food Inspection Branch has conducted more than 1000 plant audits, prompting 63 hearings in regards to licensing requirements. We feel this is a very low percentage for noncompliance as the vast majority of provincially inspected abattoirs are compliant and operate far above regulated food safety standards.

The provincial plant audit rating system is similar to that used in the federal program and poor audit ratings trigger a licensing hearing process that works effectively in dealing with non-compliant plants. The proceedings of licensing hearings have always been public information. The documents include evidence presented by the government and from the plant operator or their lawyers. They contain the Director's decision, corrective actions that need to be taken by the plant owner, the government supervision that will be provided to ensure these plants meet compliance, and in some cases a suspension of their license to operate if they pose a serious food safety risk. A recall is a system by which products that may be hazardous to consumers are removed from the marketplace. In the food industry, recalls happen frequently for products containing undeclared allergenic products and hazardous materials, and in most cases are conducted voluntarily by the manufacturer.

Meat processors want to produce safe, quality products for their customers. They recognize and appreciate the fact that the inspection and audit programs are important components of the food safety system and contribute to a strong provincial meat industry.

Our recommendations to strengthen Ontario's food safety system include:

1. The Food Inspection Branch of the Ontario Ministry of Agriculture and Food - Food Industry Division (herein referred to as OMAF) update Meat Inspection Regulations that have been under development for the past two and one-half years that would proclaim the Food Safety and Quality Act.
2. OIMP and industry participate in the review of the proposed regulations.
3. Regulations require that all meat slaughtered in the province of Ontario must be inspected and exemptions for custom poultry and producer's personal consumption be removed.
4. Standardized reporting forms be developed to help prevent inconsistent interpretation of regulations between government personnel and plant operators.
5. OMAF provide an approval process for plant design and upgrades.
6. OMAF license all food processing establishments under the jurisdiction of local health units and inspect food processing establishments at frequencies based upon the food safety risk of the products being produced.
7. Notice of Licensing Hearings and decisions posted on OMAF website.
8. Plant audit ratings be posted with provisions for amendments, recognizing plant upgrades and improvements before the next audit cycle.
9. Regulations provide for stricter penalties for those operating outside the system.
10. Regulations support enhanced enforcement activities and fines imposed for producers that repeatedly bring animals with drug residues. Producers should be made responsible for the costs of the tests.
11. OMAF assist plants that want to implement the HACCP Advantage by making funding available similar to that received by the federal plants.
12. OMAF assist plants in implementing HACCP by developing training programs and other tools for the industry.
13. OMAF provide financial assistance programs to help plants with capital upgrades that may be required to meet new food safety standards.
14. OMAF remain involved in the collection of animal identification information at the plant to be able to assist with tracing animals in the event of a reportable disease outbreak.
15. OMAF continue providing and funding sampling and testing programs. Plants require faster results in order to monitor their performance and respond accordingly.
16. Ensure the inspection program remains a core activity of the government and is publicly funded for the benefit of all Ontarians.

The OIMP provides training and education to industry through distance education courses, regional information meetings, hands on workshops, and educational seminars. Our association led the development of an independent study program for proper food handling that recognized the needs of the industry and that was applicable for the entire food industry. The course development involved representatives from industry, OMAF - Food Science and Advisory Unit, and representatives from two public health units.

Our recommendations include:

17. OMAF mandate that all food handlers be required to complete a recognized Food Handler Training course.
18. OMAF provide fee offsets for those registering for food safety courses.

Industry recognizes that inspectors are providing an essential role in ensuring food safety and that they require continual training and the necessary tools to perform their jobs. The government's move to hire full-time meat inspectors to help restore consumer confidence was in response to the negative media coverage of an issue driven by another agenda. Government and the union must recognize that our industry and agriculture does not operate Monday thru Friday 9:00 - 5:00 and that establishments require the flexibility of scheduling inspection around the needs of the industry and their customers. Industry is very concerned with the potential disruption of inspection service.

The Ontario Public Service Employee Union felt shutting down 290 provincial plants in 1996 for six weeks was protecting food safety. The strike of 1996 financially impacted the plants and many never recovered.

Industry is concerned with the direction both levels of government are exploring designating plant personnel with the responsibility of doing their own inspection. With the continuous media attention to our industry, this would significantly reduce consumer confidence. OIMP would support the principle of a qualified plant examiner doing ante-mortem inspection in a low risk plant under a HACCP program; however, an inspector must be in the plant and must perform all post-mortem inspections.

Our recommendations include:

19. Inspectors receive ongoing technical training including communication skills.
20. Inspectors be made accountable for their actions and that a system is in place for a plant operator to report unfair treatment. It was mentioned that an inspector is out of work if a plant is shut down because of a bad water sample. If the inspector took the sample improperly and the result was a false negative that business is shut down, has lost product, lost several days of production, has employees to pay, and has incurred ongoing overhead costs all without recourse.
21. Inspection services remain publicly funded and the government and industry committee continue to address the allocation of inspection hours fairly and cost effectively.
22. Provide protection for the industry to ensure there is no disruption in service.

Our association strives to provide our members with timely communications to keep them informed of current industry issues and developments. We require that information from the government. When there has been a problem in the provincial system, industry has felt very alone in defending our reputation.

Our recommendations include:

23. When regulatory or policy changes are implemented Area managers, inspectors, plant operators, and the OIMP all receive the same communications, at the same time.
24. Meet quarterly with the OIMP to provide updates on program status.
25. The government step forward and promote the excellent inspection system we have to plant operators, inspectors, auditors, stakeholders, media, and to Ontario's consumers.

In closing, thank you once again for listening to our recommendations and I will conclude with one message. We have a good inspection system in Ontario and our industry recognizes food safety as the number one priority. We require the government to provide a clear direction for our industry so companies can reflect long-term business plans to continue processing Ontario products, in Ontario, for Ontario consumers.