



**FOOD SAFETY FIRST**  
**July 15, 2009**  
**Laurie Nicol, Executive Director**

OIMP has been representing the interests and serving the needs of the Ontario provincial meat industry for the past 30 years. Our number one commitment is to food safety and ensuring the industry is strong and prosperous. OIMP has a voluntary based membership and currently represents 185 meat processors. OIMP understands the needs of small business. 75% have less than 10 employees. (104 have 5 employees or less.)

**Food safety standards** must be dictated by the level of risk associated with the products being manufactured and cannot be based on the number of employees making the product, the amount of product being produced, the square footage of the facility in which the product is being produced, the customer type, or the geographic distribution of the product (local or province wide).

We as consumers expect that our government is protecting the safety of our food. We know there is a significant portion of our population where foodborne illness can cause serious effects (elderly, young children, the immune compromised, and pregnant women). Many foodborne illnesses go unreported, at the same time technology today and information networks have made it increasingly easy to trace back the source of contamination regarding an outbreak.

There is increasing societal demand for safe food and government accountability. This was demonstrated recently by the further investigation into listeriosis after the company assumed full responsibility.

The fact is companies are producing safe food and government regulations provide the foundation for which processors must operate to ensure the integrity and safety of the food. OIMP supports the need for meat processing regulations. Further, it is our opinion that future consideration should be given to regulating other food manufacturing operations given the number of foodborne related instances in non-meat sectors.

Ontario's Meat Industry provides a significant contribution to Ontario's economy and to local communities. Our industry has made significant financial investments in their facilities and food safety systems. Ontario Meat Regulation 31/05 is not a threat to small business; in fact many of the 385 licensed plants see this regulation as a positive move towards sustainability and growth for the Ontario processed meat industry.

## **CHANGE**

The meat industry is a very traditional sector with long standing customary family practices. The industry is continually responding to change based on consumer demands and food safety concerns. Change, in any sector, is inevitable and adapting to change takes time, money, attitude, and forward thinking.

The closure of local businesses, whether big or small, is of concern to everyone as the impacts on communities are significant. We have seen the effect of the declining automotive sector, the disappearance of the corner store, the decline in the number of abattoirs, and local butcher shops.

Regardless of size, all businesses make decisions based on a number of factors not regulatory burdens alone. Today, there are over 380 licensed FSMP that are committed to enhancing their food safety requirements and who have made significant financial investments. Some butcher shops have made decisions to stop making a certain product so they can remain under their local Health inspection, others have made decisions to have their products processed in another facility that has made the financial investment to meet the regulations, and others have decided to close their doors. These are all individual business decisions that owners make.

## **REGULATIONS**

Changes to the provincial Meat Regulation to license processing activities should not have been a surprise for anyone; they had been under development for years with extensive industry consultations in 2001 with 12 meetings across the province. The recommendations from Justice Haines in 2004 led to the implementation of the new Meat Regulation. The development of the regulation was based on aligning consistent food safety standards under the National Meat Code, which was science based, outcome oriented, and included many elements of a HACCP program.

In many cases, record keeping requirements are a challenge for smaller operations. The requirements for written programs explains such things as how they were cleaning their plants, how they maintain equipment, how they deal with pest prevention, and how they would recall their product if necessary. OIMP developed a Standard Operating Procedure Manual to assist with the written programs with over 40 record keeping forms.

## **HEALTH UNIT INSPECTIONS**

Most of the establishments falling under the new Meat Regulation were subject to the Food Premise Regulation, which is provincially based with inspector oversight delivered municipally by 36 Health Units. The regulation and inspections are geared towards food service and do not address the manufacturing of products. The regulation lacks requirements for licensing, record keeping, process control standards, auditing standard, and recall procedures. The frequency of inspector visits range from 2 to 4 times a year. Because of the nature of the products being manufactured licensing under OMAFRA was more appropriate based on the level of risk to the public. The E.coli incident at Harvey's in North Bay, which sickened 235 people and hospitalized 26, is an example of the level of standards required to maintain food safety. Recommendations coming out of the investigation mirror requirements in the current Meat Regulation in the area of equipment and sanitation procedures.

## **DISAPPEARANCE OF LOCAL ABATTOIR**

In 1995 there were over 300 abattoirs across the province with many regions having 4 or 5 all competing for the same animals and cutting and wrapping service. The volume of animals processed has remained stable despite the number of closures. Some of the abattoirs gave up their license to slaughter and today only remain today in further processing, licensed as a FSMP. There are certain areas of the province that today are under serviced.

Abattoirs are not closing because they cannot meet the new regulation; they have been operating under the same regulation for many years. The decline in the number of abattoirs over the years (196 in 2003 to 168 in 2008) is related to a number of issues including the decline in livestock production (relates to decreased business for abattoirs), increased overhead costs not reflected in the cost of providing service, loss of revenue from by-products and hides, additional charges to deal with the removal of specified risk material due to federal regulations, no succession plans, shortage of kill floor workers due to a highly labour intense job with limited investment in automation, failure to reinvest in their businesses, other regulatory burdens from Ministry of Environment regarding disposal of wastewater, Ministry of Labour, municipal bylaws.

## **COST TO MEET REGULATION**

The cost to comply with regulations vary as all operations are different based on age and size of building, ongoing maintenance and upgrades, and volume and type of product being produced. The OIMP has completed 249 independent assessments to identify the areas where the plants are not currently meeting the requirement and the associated costs based on market value. In many of the assessments separation of raw and cooked product is an issue as cross-contamination is a serious risk.

Regulatory burdens alone do not close businesses – owners/operators make decisions. If you have not reinvested in your business it is not a surprise that it will cost more to catch up. Automation is necessary as is computerization – industry has not kept pace with technology.

## **WORKING WITH PLANTS**

Our industry leaders have found innovative and proactive solutions to challenges brought on by a changing market place and regulations which include collaboration amongst others in the industry. OMAFRA has demonstrated a willingness to work with the plants to meet the regulatory requirements ensuring that immediate threats to food safety are addressed. OMAFRA responded to industry's need for certified food safety programs with the development of the Advantage group of programs.

## **FUNDING**

\$25,000 in grants was made available to all plants to which the regulation applied. Eligibility of items was flexible to cover anything that would be required under the new regulation. Meat plants could also apply for federal programs such as \$29,000 in the previous FSI program and the current FSTI program for \$20,000 including \$5,000 to purchase testing equipment.

## **INDUSTRY SERVICES**

**Meat Plant Assessment Services (MPAS)** - OIMP offered industry the opportunity for FREE independent assessment to determine what investment would be required to meet full compliance with the regulation.

**Standard Operating Procedure Manual** - OIMP developed a tool to help plants with written programs and over 40 record keeping templates.

**Workshops** – OIMP has delivered 11 free workshops in the past year to 155 individuals representing 105 plants on Recall Procedures, Personnel Practices, Written Programs, Premises-Facilities-Equipment, Process Controls, Preparing for an OMAFRA Audit, Pathogen Control, Refrigeration, Labels-Printers-Scanners, Fermentation and Dry Cured Products, and Validating Environmental and Process controls.

**Technical Director** - OIMP has on staff a person with over 35 of industry experience, providing help to plant operators either through plant visits or through our 1-800 line.

**Outreach Coordinator** – OIMP has a person in the field visiting plants (over 900 since May 2008) informing the industry of their responsibility under the meat regulations and the programs and services available to them.