



OIMP Presentation to Sub Committee on Food Safety – May 13, 2009

Good Afternoon and thank you for inviting me to make a presentation before this Sub Committee on Food Safety. My name is Laurie Nicol, I am the Executive Director of the Ontario Independent Meat Processors Association (OIMP). Our organization has been representing meat and poultry processors, retailers, and wholesalers operating in Ontario for almost 30 years. We currently represent 180 members which are family owned and operated businesses located across Ontario that are both federally and provincially regulated. Many of you have these businesses located in your riding. Our members are primarily inspected by the Ontario Ministry of Agriculture Food and Rural Affairs (OMAFRA) under Ontario Meat Regulation 31/05 of the Food Safety and Quality Act (2001) and are subject to the requirements of the Food and Drug Act. The OIMP is a strong supporter of Ontario's provincial food safety regulations because it makes sense for many of our members that target domestic "in province" business only.

Ontario is fortunate to have a very diversified livestock production industry. Ontario represents the highest number of meat processors both abattoirs and further processors in Canada. In a study conducted for the OIMP in 2008 it was forecasted that Ontario's provincial meat and poultry industry represented \$2.2 billion in sales.

Currently the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) licenses 154 provincial abattoirs, and 418 free standing meat plants. These are businesses that produce ready-to-eat products through cooking, curing, fermenting, or are involved in lower risk activities such as grinding, boning, and packaging with wholesale distribution.

Food Safety is the number one priory. It's hard to believe in Canada today we still have provinces that have not implemented meat inspection programs and that food animals are slaughtered for human consumption without inspection. Our Canadian government has a responsibility for food safety oversight whether it be meat, fruits and vegetables or baked items. Food items from countries with lower standards continue to enter Canada's marketplace, while Ontario's, provincially licensed, highly regulated, plants are restricted to trade within the province. On the other side our Canadian government imposed higher standards regarding SRM regulations and the survival of Ontario's beef industry and provincial abattoirs continues to be threatened by the cost to comply with these regulations.

Regulations do not ensure food safety yet provide the protocols for under which we produce safe food products. Food safety is a shared responsibility and begins with everyone understanding their role in ensuring the products we grow, process, purchase, cook, and ultimately eat are properly handled throughout.

Ontario has the strongest recognized provincial meat inspection program in all of Canada. Our plants are not operating at lesser food safety standards than large multi national federal facilities as indicated in recent public statements.

Most of Ontario's provincially licensed establishments are family run businesses that possess unique characteristics not found in plants designed for large volume production and export markets. These smaller businesses operate at a more personal level, generally owners can be found on the plant floor controlling activities. The family structure leads to more cohesive management and better control over day to day production issues, quality and food safety outcomes. Outcome based goals and objectives are common in our industry and food safety is no exception.

The commitment to food safety in Ontario meat plants has continued to evolve and strengthen over the past 4 decades.

- In 1965 Ontario introduced the first legislation in meat plants - a regulation that dealt with red meat and by 1969 inspection was mandatory in abattoirs throughout Ontario with several exemptions. In 1982 the regulation was expanded to include white meat. These regulations were the first step in a series of initiatives that have brought Ontario to a leadership role in food safety in the provincial meat industry.
- In 1991 legislation was passed that required all animals slaughtered and offered for sale in Ontario must be inspected.
- In 1992 the OIMP and OMAFRA developed a Meat Industry Training course to educate operators on their requirements under the regulation. This was also used as training material for inspectors.
- In 2000 there was the first attempt at establishing a National Standard for the meat industry. Both the Ontario government and OIMP participated on the working group to develop a National Meat and Poultry Code.
- In 2001 Ontario's Food Safety and Quality Act was enacted and formed the framework for the development of an enhanced Meat Regulation that is currently in force.
- In 2003 the OIMP co-authored with OMAFRA the Food Handler Training Course that became the recognized standard for mandatory food handler training in provincially licensed meat plants.

- Due to the fact that CFIA could not provide HACCP certification for non-federally registered meat plants Ontario developed the Advantage HACCP program based on Codex Alimentarius standards which was launched in 2004.
- In 2004 a very public review of Ontario's meat inspection program was conducted by Justice Haines. Many of recommendations were already under development as Ontario was regularly updating their standards.
- In 2005 Ontario Meat Regulation 31/05 was introduced forming the basis of solid prerequisite programs. These standards (i.e. requirement for written programs, record keeping, temperature controls, cleaning and sanitizing standards, and personnel practices) lay the ground work for further development of enhanced food safety programs (HACCP programs). To ensure the effectiveness of Ontario's meat regulation OMAFRA has licensing requirements with compliance and enforcement tools, veterinarian based inspection in abattoirs and a further processing inspection program, external audit program, water sampling programs, microbial sampling, baseline studies, and an inspection legend to readily identify Ontario Inspected meat products.
- In 2005 CFIA initiated a Meat Inspection System Review a second attempt to integrate a National standard in which OMAFRA participated.
- This lead to development of the Draft Canadian Meat Hygiene Standard with anticipated stakeholder consultations to take place summer/fall 2007 which came to a halt suddenly in 2008.

Despite all the improvements and investments that Ontario (both government and industry) have made to strengthen it's provincial meat inspection programs and food safety systems, Ontario continues to battle market access limitation (from the Ontario retail/foodservice community and interprovincial opportunities).

OIMP Recommendations:

1. We need a standardized domestic food safety program across Canada based on food safety outcomes.
2. We need recognition by the federal government (Canadian Food Inspection Agency) that Ontario Meat Regulation 31/05 meets the federal meat regulation in food safety standards and that Ontario's Advantage HACCP is recognized as equivalent.
3. Lastly food safety is a permanent and critical part of the culture in our meat processing businesses. We need more ongoing training for inspectors and industry to ensure delivery of uniform programs at a national level and we need to do a better job at educating consumers on their role of food safety.

Background:

Ontario's Food Safety Standards In Provincially Licensed Meat Plants

Food Safety Standards Equivalency

In 2002, the Canadian Food Inspection Agency (CFIA) and Health Canada conducted a parallel review of the National Meat and Poultry Regulation and Code (NMPRC) to the federal Meat Inspection Act. The Code was evaluated by Health Canada, CFIA and the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA), and, following modifications, was deemed to be equivalent to the federal standard for food safety outcomes. The NMPRC was to provide a meat processing standard that was acceptable for domestic markets recognizing that other countries impose stringent building requirements and product specifications for trade purposes.

In 2005, the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) introduced Meat Regulation 31/05 under the Food Safety and Quality Act (2001). This regulation was developed to meet the NMPRC standards using an outcome oriented and science-based approach. *“Moving to harmonized standards sets the stage for eliminating technical inter-provincial barriers to trade and is also an important step in addressing the misconception that Ontario’s meat safety standards are inferior to federal meat safety standards”.* (Leona Dombrowsky, Minister of Agriculture, Food and Rural Affairs letter to OIMP member March 9, 2007).

In 2005, the CFIA and OMAFRA began the development of a new Canadian Meat Hygiene Standard which would provide flexibility while retaining a clear focus on meat hygiene outcomes with a science based approach. Consultation with industry on the new standard was to take place in summer/fall 2007 and begin developing technical documents. *“This new standard will improve upon the previous work because of a more systematic focus on meat hygiene outcomes, instead of on prescriptive compliance procedures. When completed, this standard will serve as a single foundation for meat inspection in Canada,”* (Chuck Strahl, Minister of Agriculture and Agri-Food letter to OIMP Dec 6, 2006). In 2008 amidst the federal government turmoil this process came to a complete halt.

HACCP Programs

The Codex Alimentarius Commission was created by the Food and Agricultural Organization (FAO) and the World Health Organization (WHO) of the United Nations to develop food standards, guidelines and related texts such as codes of practice under the Joint FAO/WHO Food Standards Programme. In an effort to eliminate problems associated with differing interpretations of how HACCP should be applied, the Codex Alimentarius Commission produced internationally agreed-upon HACCP guidelines. The information provided by Codex is used around the world in the development of HACCP programs. The Advantage HACCP program was developed by OMAFRA and is audited by the Canadian General Standards Board. The Food Safety Enhancement Program was developed by the CFIA and is audited by the CFIA. Each approach developed may be somewhat different. For instance, a government may choose to build regulatory or trade requirements into an approach, or set prescriptive standards rather than outcome-based standards.

Ontario Provincial Meat Inspection Program:

Licenses

Currently there are 154 provincial abattoirs and 418 free standing meat plants (FSMP) licensed by OMAFRA. Abattoirs that process live animals and free standing meat plants that produce ready to eat products through cooking, curing, fermenting, dehydrating or lower risk activities such as grinding, boning, packaging or wholesaling are subject to licensing according to the requirements set out in Ontario Meat Regulation 31/05 under the Food Safety and Quality Act (2001).

Veterinary Based Inspection

Ontario's provincial inspection system has a strong veterinary base similar in structure to the federal meat inspection program. An inspector is present at the provincial abattoirs to perform ante mortem and post mortem inspection of all animals with veterinary support available at all times the plant is conducting slaughter operations.

Meat Hygiene Officers and Further Processing Inspectors

Meat Hygiene Officers are on sight at an abattoir at all times while animals are being processed. Further Processing inspectors visit free standing meat plants based on information collected in OMAFRA's Food Safety Decision Support System, and risk assessments that determine the level of inspection required.

Inspection Standards

Ontario Meat Regulation 31/05 forms the basis of solid prerequisite programs (i.e. requirement for written programs, record keeping, temperature controls, cleaning and sanitizing standards, use of coolers and freezers and personnel practices). These standards lay the ground work for further development of enhanced food safety programs with support from the Advantage series of GMP and HACCP programs.

Audit Program

In addition to full slaughter inspection (every time the plant is in operation) and risk-based inspection frequency for secondary processing, provincial plants undergo audits to assess compliance to Ontario Regulation 31/05 and the Meat Plant Guidelines. These audits are conducted by independent professional auditors who assess the food safety risks. Where necessary, corrective action plans are developed to bring plants into full compliance. The plant rating is posted on the OMAFRA website. Inspectors follow up and update all corrective action plans at all inspection visits through the Ministry's Food Safety Decision Support System, an information system that collects and stores all inspection-related information.

Compliance and Enforcement

OMAFRA shares responsibilities for compliance and enforcement of its regulations with the Ministry of Natural Resources (MNR). OMAFRA has authority to issue compliance orders related to the FSQA i.e., warnings, orders and hearings that lead to potential licence suspension/revocation. Investigations are conducted by MNR where activity in the plants is severe or potentially falls outside the FSQA (criminal, federal violations, etc) and the operator can be charged and tried in a provincial court.

Water Sampling Program

OMAFRA's water monitoring program for meat plants is one of the strongest in Canada. A potable supply of water is required for the safe operation of a meat plant. OMAFRA takes test samples in all licensed facilities at minimum monthly and more frequently based on previous results. Well water in licensed plants must have an effective treatment system to prevent adverse microbial presence.

Microbial Sampling

OMAFRA completed baseline studies to determine the prevalence of microbiological, physical and chemical hazards associated with pork, beef, chicken and fermented products. They are currently conducting a microbial sampling program in all provincially licensed plants producing ready to eat products.

Meat Product Standards

Standards relating to composition, processing, weights, organs, casings and receiving of inspected meat parallel federal requirements. The same standards are applied in the Ontario meat regulation and the federal meat regulation.

Inspection legend

The form, use and restrictions regarding the application and presentation of an Ontario Approved inspection legend are set out in the Ontario meat regulation in much the same way the federal meat regulation outlines conditions and restrictions on use of the federal inspection legend.



Recall

The provincial meat regulation sets out requirements for distribution and recall procedures that enable the company to voluntarily recall product in a timely matter should a recall action be necessary. The Provincial Medical Officer of Health and Federal Minister of Agriculture have the authority to issue a mandatory recall where necessary.

Labelling

The federal Food and Drugs Act and its regulations and the Consumer Packaging and Labelling Act and its regulations set out the rules for meat product labels. The Fair Labelling Practices Program and the Guide to Food Labelling and Advertising are used by the CFIA to interpret these regulations. These rules apply to provincial plants in the same way they apply to federally inspected plants.

Food and Drug Act

The Food and Drug Regulation sets a national standard under which food products including meat may be manufactured in terms of composition, nutrition, use of ingredients, additives, allergens and labelling. All food manufacturers whether federally registered, provincially licensed or under municipal health inspection must adhere to the regulation under this act.