

“FARM TO FORK - A Strategy for Meat Safety in Ontario”

The Ontario Independent Meat Processors (OIMP) wishes to acknowledge Justice Haines for the very comprehensive examination he conducted on Ontario's Meat Inspection System and are thankful for the opportunity to submit our comments during the review. We have reservations on the intention of Ontario's government to implement all of Justice Haines' recommendations with little regard for the financial resources required for both government and industry. The OIMP will limit comments at this time to those recommendations which we anticipate will have a direct impact on our members in the immediate future. The OIMP recognizes the pressures to move quickly to proclaim the Food Safety and Quality Act, but is very concerned with the lack of industry consultation and input into new regulations and standards that will impact Ontario's non-federally registered meat processors. (#1¹) Many of Justice Haines' recommendations provide direction with the impact to be determined when implemented into Ministry policies and standards.

We raise the following questions in regard to implementing new regulations:

- What is the transitional time frame being proposed in which companies will have to comply with the new regulations? Will there be any grandfathering?
- Has adequate time been given to properly train inspectors and industry?
- Was an economic impact analysis been conducted and, if so, what were the results?
- Will there be funding available to industry to facilitate the changes required?
- Has any consideration been given to the technical support required, both internally within the ministry and to the industry to deal with the new regulations?

We offer the following general comments concerning regulations:

- New regulations must include free standing processors as defined in the report, and the establishments should be inspected by OMAF at a frequency determined by the level of food safety risk. (#62, 63)
- Regulations developed under the *Food Safety and Quality Act, 2001* must contain consistent standards for all meat retailers whether under the *Food Premises* regulation or *Meat Regulations*. (#108)

Without the benefit of previewing draft Meat Regulations we offer the following specific areas of concern:

- Establishment of mandatory microbiological performance standards that are enacted by way of regulation. Consideration be given to the frequency of sampling required by the plant, the cost of sampling, and should this include water sampling. (#8)
- An annual licensing fee be established that covers the administration costs of processing a license, based on volume processed with consideration for seasonal operations and to include free standing processors. (#44) Plants should not be responsible for paying for inspection service, audits, or any testing. We have concerns with how the ministry will determine the number of inspectors required in the abattoirs to provide proper inspection. (#54)
- The authority provided to inspectors cannot be awarded without consideration for a process by which a plant can appeal a decision and provide an avenue to recover costs for lost production when evidence proves that inappropriate actions taken by the inspector have negatively impacted the business. (#55)
- Regulations concerning testing required at the plant provide the government the ability to charge and collect fees directly from the producer instead of the plant. (#57)
- The disposal of meat production waste, including dead stock, should be covered by regulations under the Nutrient Management Act and administered by OMAF. The ministry should continue research on alternative methods of disposal. (#83)
- Regulations under the *Dead Animal Disposal Act* and *Meat Inspection Act* requiring deadstock, and other meat production waste, to be disposed of within 48 hours unless frozen and stored in accordance with standards to be set out in the regulations, must take into consideration small operations that based on volume and the disposal costs have only a weekly pickup of by-products. (#84)
- Safe handling labels on all meat products for sale is a positive step towards educating consumers but should not be regulated without consideration for the cost/benefit analysis as currently underway by Health Canada. (#90)
- In keeping with a national strategy for traceability, regulations should require the Ministry continue to collect animal identification information at the provincial plants to ensure accuracy and that Ontario maintains a comprehensive system. (#12,13)

¹ # refers to the specific recommendation in the Haines Report

HACCP

Industry acknowledges the benefits of implementing HACCP systems but recognizes mandatory HACCP programs across all sectors of the food continuum may not be a realistic approach. (#3) For Ontario's non-federally registered meat processors we recommend adopting a voluntary program for the following reasons:

- The federal government has taken over six years to phase in mandatory HACCP and the same consideration should be given to the smaller companies.
- Increased market access is a misperception based on retailer's policy to purchase federal product only and their reluctance to acknowledge establishments that implement the OMAF HACCP Advantage program.
- We have concerns whether there is an adequate supply of qualified HACCP consultants and the fact there is no accreditation program for HACCP consultants.
- Industry requires training, written materials and tools, guidelines, and generic models. (#4) The OMAF HACCP Guidebook, including standardized record keeping forms, needs to be in place prior to implementation.
- Small and medium-sized enterprises need \$25,000 per plant to access support and assistance for the implementation of mandatory HACCP programs. This support should allow for capital expenditures. (#5) Additional assistance in the form of grants, and low interest loans should be made available to be applied towards HACCP implementation costs including capital costs. The Ministry could assist in educating the lending institutions and insurance industry of the merits of HACCP adoption. (#6)

COMMUNICATIONS

The establishment of an effective communication system between OMAF, inspectors, and industry stakeholders must be developed and maintained.

- OMAF should consider implementing the similar notification system that CFIA provides industry when changes are made to the Meat Hygiene Manual.
- The business plan for OMAF's food safety initiatives with appropriate methods to measure the results and deliver an annual public report outlining its program priorities, strategies, objectives, and achievements should reflect a 3-5 year business plan in order for companies to make informed business decisions. (#2)
- Various joint initiatives have been identified between ministries and should invite industry participation to provide input and provide reports from such meetings. (#9)
- In order to maintain a cooperative and effective approach to food safety, both industry and the inspectors require timely results of all testing and decisions on operational issues. Systems need to be in place to ensure appropriate actions are taken, documented and follow up provided. (#18, 47, 51, 52)
- Communicating to the public is essential to educate, inform, and instill confidence in our food supply. In the reorganization of the branch a spokesperson must be identified and available at all times to address the public's questions.
- OMAF needs to communicate the risks of purchasing uninspected meat (#91), mishandling food, and promote uniform consumer food safety education programs for delivery throughout Ontario. (#92)

TRAINING

The need for comprehensive training programs for inspectors and for industry is imperative. The OIMP has demonstrated the effectiveness of industry and government jointly developing materials.

- With financial and technical support, similar to that received for the development of the Food Handler Training program, the Meat Technology program could be updated to provide standardized training programs for all personnel at abattoirs on humane animal handling, slaughter and dressing, processing, curing, and sausage making. (#45)
- A comprehensive training program for meat inspectors in Ontario should be developed to acknowledge an accredited profession with mandatory requirements for continuous education and recertification. Training curriculum and standards should parallel to training of public health inspectors across the province, addressing meat safety and the regulatory standards for food premises. (#49, 50, 67)
- Food Handler training for all personnel handling food products should be mandatory and require recertification every five years. The ministry should recognize the appropriate level of training required for each sector. Food Processors must complete the Food Handler Training Course as development with OIMP and OMAF, and operators of Food Premises (restaurant/food service/retail) should complete the Ministry of Health curriculum. (#68)
- Consumer food safety education must make its way back into the curriculum for elementary and high school students. (#93, 94)

¹ # refers to the specific recommendation in the Haines Report