



October 3, 2016

Andrea Smallwood
Policy Advisor, Legislative Policy Unit
Food Safety and Environmental Policy Branch
1 Stone Road West, 2nd Floor,
Guelph, Ontario, N1G 4Y2

Dear Andrea,

We appreciate the opportunity to provide feedback on the Discussion Paper: Proposal for a Fish Food Safety Regulation under the Food Safety and Quality Act, 2001.

Ontario Independent Meat Processors (OIMP) is a not-for-profit association representing over 300 members across Ontario including abattoirs, processing plants, butcher shops, suppliers and partners. As a single and unified voice for meat and poultry processors since 1980, the OIMP provides industry leadership on matters that directly affect our members. Our objective is to protect, grow and strengthen our industry to the benefit of all members and best serve Ontario consumers.

On behalf of the provincially licensed meat plants we will be commenting only on those pieces in the discussion paper that have a direct impact on their businesses, specifically the mandatory registration and licensing of any provincially licensed meat plant that is processing fish or selling fish products.

OIMP recognizes the important role that the fish processing sector plays in Ontario's agri-food economy and supports initiatives that would support the growth and development of this industry. OIMP is also supportive of modernizing regulations in order to be outcome based to address food safety risks in a flexible way while reducing unnecessary burden and establishing requirements that are appropriate for the level of risk.

Provincially licensed meat plants and abattoirs that are handling fish are regulated under Ontario Meat Regulation 31/05 and already have all of the basic construction, operational and processing requirements as well as policies, program and procedures in place that incorporate modern food safety standards and current industry good manufacturing practices. Ontario Meat Regulation 31/05 requires licensed meat plants to have all of the registration and licensing requirements as proposed in Appendix B of the Discussion Document. These plants are inspected on a frequency as established by OMAFRA's risk assessment process (FOIL) as well as audited on an annual basis to ensure compliance to the regulations.

In 2015 provincially licensed meat plants that handle or process fish developed and implemented a Fish Handling Protocol that was submitted to OMAFRA for approval. This protocol established plant specific procedures to protect food products from cross-contamination as well as demonstrating that food safety risks were being controlled.

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The discussion paper proposes to support competitiveness *“With the changes, duplicative regulatory oversight would be eliminated and the scope of the proposed regulation would be more clearly defined. Requirements would be appropriate for the potential risks and would enable business innovation,”* while in fact, in provincially licensed meat plants this would be the exact opposite. There would be dual licensing which would result in duplication of regulatory oversight including inspection and audit. This duplication would in fact cripple their ability to be innovative, and those producing small amounts of fish and fish products catering to a specific market, e.g. South African, European, Asian, would remove these products from their offerings. The burden of duplicative regulatory oversight would limit these companies from being competitive in the marketplace.

Further to the concerns OIMP raised at the consultation meeting we attended on September 9th, OIMP’s Board of Directors reviewed the proposal and are strongly opposed to placing additional regulatory burden on our provincially licensed meat plants.

We would be happy to further discuss our position.

Sincerely,

A handwritten signature in cursive script that reads "Laurie Nicol".

Laurie Nicol
OIMP Executive Director

cc: OIMP Board of Directors