



November 8, 2017

Laura A. Pisko, Director
Health Protection Policy and Programs Branch
Ministry of Health and Long-Term Care

Dear Ms Pisko,

Ontario Independent Meat Processors (OIMP) is a provincial non-profit association formed in 1980 to represent Ontario's meat and poultry processors, retailers and wholesalers operating under federal, provincial or municipal inspection. As a single and unified voice for meat and poultry processors in Ontario, the OIMP provides industry leadership on matters that directly affect the sector.

OIMP supports the initiative of the Ontario Ministry of Health and Long-Term Care to amend Food Premises Regulation 562 under the Health Protection and Promotion Act. We believe that all levels of government should strive to align their food safety policies to provide a clear, modernized and more outcome-based approach to ensure that Ontario food products remain among the highest in quality and safety.

It is difficult to provide effective feedback with the lack of details to this regulatory proposal for changes to Food Premise Regulation 562 and would like to see the proposed regulatory amendments.

We support the need for consistent interpretation and application of the regulatory requirements as they apply to all food premises across the province. This would include the definition of food service premises and manufactured meat products that can be understood by all stakeholders and at all levels of government. The recent ruling of October 25, 2017 from the Agriculture, Food and Rural Affairs Appeal Tribunal for Steven Lantz of Lantz Meat Market vs Director of Regulatory Compliance (RE) clearly demonstrates the need for definitions that reflect the food safety requirements for meat processing.

Our recommendation: Food Premises conducting category 2 activities, the manufacturing of high risk products as defined by Ontario Meat Regulation 31/05, should either be prohibited from making these products or be subject to the same requirements as provincially licensed meat plants. Requirements would include the need for:

- shipping, receiving, handling and storage records
- written sanitation program which includes cleaning and sanitizing procedures, schedule, monitoring, pre-operational assessment
- equipment maintenance and calibration program
- written pest control program
- process control records which includes the requirement to keep written recipes, processing records, temperature control records, demonstrate process controls for fermented and dried cured products e.g. calculating degree hours and trichinella control
- allergen control program
- recall program
- process controls for hunted game
- demonstration of competency for those employees involved in the manufacturing of these high-risk products

Over the past 10-15 years there has been a tremendous amount of work completed around the area of food safety and regulatory responsibilities to draw from and trust they were considered when drafting new regulations.

- In 2004 Justice Haines conducted a Meat Regulatory and Inspection Review and had many recommendations related to OMHLTC and inspection in Food Premises.
- In 2005 the introduction of Ontario Meat Regulation 31/05 led to OMAFRA licensing food premises, what we call today free standing meat plants (FSMP), that were conducting higher risk activities such as canning, curing, dehydrating, emulsifying, fermenting or smoking.
- In 2011 under the Open for Business Sector Strategy Health and Long-term Care Response to the Hospitality Sector (Ontario Restaurant Hotel and Motel Association) there were a number of recommendations for improvement to food safety inspection reporting.
- On January 1, 2014, OMAFRA licensed meat plants were required to implement validated process controls and/or end product testing to support the production of safe fermented sausage and dried meat products
- The 2015 Food Retail and Food Services Code outlined the necessity to have control of food hazards and inspection based on a risk assessment that would establish a risk category for the premises (high, medium or low).
- The 2015 Guidance Document for the Risk Categorization of Food Premises outlines the need for a Food safety management plan and demonstrated evidence of CCP monitoring.
- Health Canada established policies and guidelines for control of pathogenic microorganisms including the “Policy on *Listeria monocytogenes* in Ready-to-Eat Foods”, and “Interim guidelines for the control of verotoxinogenic escherichia coli including *E. Coli O157:H7* in ready to eat fermented sausages containing beef or a beef product as an ingredient”, and Retail Guidance Document: Pathogen Control (including *Listeria monocytogenes* in Ready-to-Eat (RTE) Refrigerated Foods”.

Ontario's meat industry is a significant contributor to Ontario's economy and the impact if we fail to have appropriate regulations/policies for high risk activities is not one our sector can withstand.

Ensuring consumers have safe and wholesome foods is our number one priority regardless of where the food item is consumed. When an illness or death is attributed to a particular food product the entire industry is financially impacted as consumers lose trust in our food safety system.

Thank you for the opportunity to provide comments and would welcome the opportunity to further discuss the proposed regulatory changes.

Sincerely,



Laurie Nicol
OIMP Executive Director