The Next Generation:
Food Safety Policy and Programming in Canada
2008 - 2013

Round 2 Submission

submitted by the
Canadian Supply Chain Food Safety Coalition

22 March 2006

19 Elm Street, Ottawa, Ontario, Canada, K1R 6M9
Telephone: (613) 233-7175
Email: cscfsc@monachus.com Website: www.foodsafetycoalition.ca

1.0 Introduction

The Canadian Supply Chain Food Safety Coalition and its member organizations participated in the 1st round of consultations in December 2006. We welcome this opportunity to present our comments and recommendations during the 2nd round of consultations and look forward to further consultations during the 3rd round.

2.0 Canadian Supply Chain Food Safety Coalition

The Canadian Supply Chain Food Safety Coalition was formed in December 2000 by national associations representing all segments of the food chain from input suppliers through primary production, processing, manufacturing, transportation, distribution to final marketing at retail or in food service. It is a unique organization that is open to all national, provincial and local industry associations with an interest in food safety and to companies providing services to food associations and their members.

> **Our Vision:** *Canada's agriculture, fisheries and food industry will have a world-class reputation for producing and selling safe food.*
>
> **Our Mission:** *The Canadian Supply Chain Food Safety Coalition will facilitate, through dialogue within the food industry and with all levels of government, the development and implementation of a national, coordinated approach to food safety to ensure credibility in the domestic and international marketplaces.*

Food safety is a top of mind concern with Canadian consumers, our customers around the world and with all levels of government. The Canadian Supply Chain Food Safety Coalition believes that the responsibility for assuring food safety is shared by all participants in the industry and by all levels of government. However, it is concerned that the situation in Canada is characterized by an increased regulatory burden, a multiplicity of standards, approaches and regulations, unnecessary costs and consumer confusion.

The Canadian Supply Chain Food Safety Coalition was formed to foster an alternative Canadian approach to food safety policy development: one that emphasizes consultation, harmonization and transparency and is based on partnership within industry and between industry and all levels of government (national, provincial and local).

Since its formation the Coalition has been an active participant in the dialogue with governments on food safety policy and programming. This has involved:

- holding two symposia to focus industry and government attention on key food safety policy issues (2001, 2002);
- co-sponsoring with Agriculture and Agri-Food Canada a major conference on traceability (2002);
- holding an industry workshop on communicating food safety initiatives (2003);
- co-sponsoring with the federal, provincial and territorial food safety committees the first industry/government forum on food safety (2004);
- co-sponsoring with the Canadian Food Inspection Agency a major workshop on emergency preparedness planning (2005);
- co-sponsoring with federal agencies a workshop on pandemic preparedness planning (2006); and,
- co-sponsoring with Agriculture and Agri-Food Canada and other federal agencies, a major table top simulation for the agri-food industry of a pandemic influenza outbreak (March 2007).

The Coalition has also established a working relationship with the key federal departments and agencies dealing with food safety, in particular CFIA and Health Canada, and with the three major intergovernmental food safety committees: the FPT Committee on Food Safety Policy, the FPT Agri-food Inspection Committee, and the Canadian Food Inspection System Implementation Group.

3.0 The Next Generation of Food Safety Policy - Recommendations

Recommendation 1. The next generation framework should include food safety as a priority theme.

Recommendation 2. Prior to completing the design of the next generation framework, the federal, provincial and territorial governments should engage the food supply chain and consumers in a focussed review of the national food safety strategy and develop a new vision of food safety in Canada to replace the 1994 Blueprint.

> This new vision will ensure the development and implementation of a national, co-ordinated approach to food safety and ensure credibility in the domestic and international marketplaces

Recommendation 3. This new vision of food safety in Canada must recognize the important transformation that has taken place in the Canadian approach to food safety as a result of industry developing and implementing national, HACCP-based food safety programs.

Recommendation 4. The next generation framework must include a renewed and well resourced commitment to greater harmonization of food safety policies and regulations across jurisdictions in Canada. This is key to a national approach. The Coalition is convinced that steps can be taken within the short term and greater progress could be made by provinces in this area. For example, provinces and territories could:

- **make commitments to implement national codes within reasonable time frames;**
- **refrain from establishing additional requirements or provincial initiatives in key areas such as food safety training and certification;**
- **co-operate in the establishment of competency-based national examinations to permit multiple training options and labour mobility; and,**
- **support the implementation of national industry-led initiatives.**

Recommendation 5. Prior to concluding the current APF, governments must initiate discussions with industry and other stakeholders on the establishment of a new and effective food safety decision-making mechanism with industry and set a realistic time frame for the conclusion of these discussions.

> The Coalition notes that this matter was included in the 2003 APF commitment: *"To establish governance systems to allow for integrated policy development and legislative harmonization among the governments (20.2.3) .... the development of a national mechanism for integrated decision-making on food safety matters (22.1.4) and .... improving the legislative framework and decision-making process for food safety, including outcome-based national standards and legislative harmonization (22.1.5.4).*"

Unfortunately, in the years since the signing of the APF, governments have not made any visible progress in meeting their goals. The Coalition and its members are concerned:

- that the mandates of the committees still overlap;
- that the resources allocated by the federal, provincial and the territorial governments to their work are insufficient to ensure that files are advanced at more than a snail's pace:
- that the workplans and activities of these bodies are not transparent to stakeholders;
- that the channels of accountability remain confused and that matters are not finally placed before Ministers for decision; and,
- that Canada's national, provincial and territorial legislative and regulatory systems for food safety are not integrated and harmonized.

When contrasted with the systems in place in other countries, federations and groupings, for example Australia, Australia/New Zealand and the European Union - Canada is not following best practice or meeting the expectations of industry or other stakeholders.

Recommendation 6. The next generation framework must include continued funding for the development of the infrastructure required to support industry-based food safety and traceability programs and increased implementation assistance for micro, small and medium-sized businesses. This should include:

- **funding assistance for the development of industry-led programs (e.g. standards, management systems and training) for those segments of the supply chain that have not yet begun work;**
- **funding assistance, as a long-term commitment in the context of the public good, for the updating of programs and administrative services required to maintain the program capacity; and,**
- **increasing funding for implementation assistance to micro, small and medium sized businesses within all segments of the supply chain, not just primary production.**

The partnerships that have been established between national industry associations (on-farm and post-farm) and Agriculture and Agri-food Canada under the Canadian On-Farm Food Safety Program, the Canadian Food Safety Adaptation Program and the Canadian Food Safety and Quality Program have been very successful. They have led to the development of technically sound, HACCP-based programs and to the establishment, in some cases of the capacity to deliver these programs to farms and food businesses. These development programs require revision to take into account "second" generation development costs and other costs that were not identified when the programs were designed. The implementation programs have been less successful and require major changes and expansion so that they are available to micro, small and medium sized firms all along the supply chain, not just in primary agriculture, implement the national HACCP-based programs.

Recommendation 7. The next generation of funding programs must also be more streamlined and efficient so as to:

- **reduce application costs and increase program uptake;**
- **reduce project approval times; and,**
- **reduce administrative burdens and associated costs not currently funded.**

The current funding programs are too bureaucratic. Applications for similar program funding prior to the APF required simple applications and basic accounting for funding and were expeditiously reviewed, sometimes within less than thirty (30) days. Applications for the current programs must now progress through a lengthy and complex process that takes a minimum of ninety (90) days. In addition, the applicant organizations have to establish complex accounting schemes and engage in significantly more onerous reporting. The Coalition's members report that this is discouraging some them from continuing in the process.

This concern has been raised repeatedly by industry with AAFC and was flagged to the APF review panel during its work in late 2005 and early 2006. The Coalition has noted and agrees with the review panel's conclusions that:

> *The Panel recognized society's increasing concern for accountability in the spending of public funds, but program implementation needs to be more streamlined and efficient. This could serve to: reduce application costs and increase program uptake; reduce project approval times (e.g. by making decisions closer to the ground through the delegation of authority); reduce administrative burdens and associated costs not currently funded; shift the focus from processes and procedures to outcomes; enable efficiency gains to be invested in activity areas offering a higher return, and; facilitate course corrections to optimize the effectiveness of the agreement.* (APF Review Panel, Technical Report, May 2006, p. 63)

Recommendation 8. Governments need to make a priority of the following infrastructure initiatives:

- **completing the development of the official recognition program for on-farm food safety programs by May 2007;**
- **working with industry to expand the official recognition program for HACCP-based food safety programs to the post-farm segments of the supply chain by the end of 2007; and,**
- **developing the national infrastructure for food safety management systems, including the requirements for the training of food safety auditors by the end of 2007.**

The APF committed governments to completing the national on-farm food safety recognition program by the end of 2003. This project is now expected to be completed by late -2007, ten (10) years after it was originally identified as an issue and eight (8) after government negotiations with industry commenced in February 1999.

Progress on the establishment of parallel approach to recognizing the programs developed by the post-farmgate industry associations has now finally begun (early 2007). The Coalition is pleased to be acting as focal point for industry participation and our members hope the discussions between industry and government will progress quickly and that this new program will be fully operational in 2008.

The 1st Industry/Government Food Safety Forum (May 2004) identified a number of key infrastructure issues that needed to be resolved to ensure that the new Canadian approach to food safety realizes its potential. These included developing a national infrastructure for accrediting certification bodies to audit and register food safety management systems, undertaking a dialogue on the qualifications and competencies

of food safety auditors, etc. The Standards Council of Canada has recently established its accreditation scheme for certification bodies under ISO 17021:2006 and ISO TS 22003:2007 putting in place one of these key elements. A national dialogue on food safety auditors is still required.

Recommendation 9: To further traceability initiatives in Canada, FPT governments need to commit to reference the Can-Trace Data Standard as a key element of the national traceability system and expand the membership of the new traceability advisory bodies to include representatives from all segments of the supply chain, not just those involved with livestock and poultry.

As noted above, the Coalition first collaborated with AAFC on traceability in June of 2002, just prior to the signing of the APF. The Coalition has supported activity in this area since that time. Our members were amongst the industry groups that established the Can-Trace initiative to develop a national data standard. Industry appreciates both the federal funding support and the participation of the federal and provincial governments in this successful project. However, with the notable exception of Ontario, it is unclear if governments fully support the use of this data standard by industry.

Coalition members have also indicated that they appreciated the opportunity that Can-Trace provided to engage in traceability discussions with a wide range of supply chain partners and in a broader context than the commodity-specific value chains. With the conclusion of the Can-Trace project and the new government emphasis on traceability in the livestock and poultry sector that generic industry forum has disappeared. However, the needs of the non-animal sectors continue. There is a need to provide a mechanism for all segments of the supply chain to dialogue on traceability and for discussions between it and governments.

Recommendation 10: The next generation framework should also include a significant increase in the public funding of consumer food safety education.

Since 1997, industry and government have collaboratively supported the establishment of consumer food safety education programs through the Partnership for Consumer Food Safety Education. This is in addition to the initiatives that many government and food businesses engage in through their own initiative. However, it is clear that more work is required. Each year in Canada, there are a significant number of cases of food borne illness and this costs Canadian health services, industry and society as a whole hundreds of millions of dollar per year. Many of these cases are preventable through improved food safety practices in the home. Furthermore, it has been demonstrated in other fields, the anti-smoking initiatives are a prime example, that sustained and well-funded activities can change behaviour.

4.0 Conclusion

In closing, the Canadian Supply Chain Food Safety Coalition would like to express its appreciation for this second opportunity to participate in the development of the food safety components of the Next Generation of Agriculture and Agri-Food Policy.

Heather Holland, Chair