



CANADIAN SUPPLY CHAIN FOOD SAFETY COALITION

COALITION CANADIENNE DE LA FILIÈRE ALIMENTAIRE POUR LA SALUBRITÉ DES ALIMENTS

**Submission to the Members
of the Subcommittee on Food Safety**

8 June 2009

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Mr. Chairman and Members, thank you for inviting the Canadian Supply Chain Food Safety Coalition to appear during your hearings on this important subject.

1. Canadian Supply Chain Food Safety Coalition

The Canadian Supply Chain Food Safety Coalition was formed in December 2000 and incorporated under the Canada Corporations Act in 2007 to act as *“a single strong voice for Industry along the food chain, with the public and government on industry-wide food safety issues”*. Our **membership** is composed of national, provincial and regional associations involved in the agri-food industry and of individual companies that provide services to the industry. As you can see from the attached membership list (Appendix A), we represent organizations whose members encompass every link in the supply chain from input suppliers through primary production, transportation, processing, manufacturing and importing to final marketers at export, retail and food service.

Our **mission** is to:

*“facilitate, through dialogue within the food industry and with all levels of government, the development and implementation of a **national, co-ordinated approach to food safety** to ensure credibility in the domestic and international marketplaces”.*

Over the past eight (8) years, we have been actively involved in consultations with ministers and with officials at all levels (federal, provincial and territorial) and in intra-industry discussions about the future shape of Canada’s food safety system.

We see the work of your subcommittee as a valuable opportunity to continue this work and to realize our **Vision** that:

“Canada’s agriculture, aquatic and food industry will have a world-class reputation for producing and selling safe food.”

2. Guiding Principles

In March 2009, the Coalition completed a year-long project¹ to develop a National Strategy for Industry-led Food Safety Programs (copies in English and in French are attached). The participating organizations, members and non-members, which worked on this strategy, determined that it should be grounded in a set of four guiding principles. These principles are the basis of our recommendations to this Subcommittee:

¹ The Coalition’s project was funded in part by a contribution from Agriculture and Agri-food Canada under the Canadian Food Safety and Quality Program and in part by contributions by Coalition members and other interested parties including provincial governments.

Principle #1: Food safety is a shared responsibility of all participants in the supply chain, input suppliers, businesses involved with the production, processing, manufacturing, importing, distribution, retailing and marketing of food, all levels of government and consumers;

Principle #2: Governments at all levels, the agri-food industry and other stakeholders should foster and facilitate the development of an integrated, co-ordinated, and national approach to food safety policy and regulation based on sound scientific risk assessment and risk management principles and on international standards.

Principle #3: Industry and government food safety initiatives should encourage the implementation of HACCP and/or HACCP-based food safety systems by businesses all along the supply chain.

Principle #4: Food businesses, governments and other stakeholders have a responsibility to adequately resource, proactively manage, update, maintain and continually improve their individual and collaborative food safety systems and food safety initiatives.

3. “A shared responsibility”

Businesses involved in the agri-food supply chain clearly recognize that they have a responsibility for food safety which they share with governments and consumers. This is not a recent recognition or awareness. Canadian agri-food businesses and their associations have consistently and continually advocated this, especially over the past two decades of rapid change in the Canadian and global approaches to food safety.

We ask members of the subcommittee to endorse this Principle in your final recommendations.

4. “A national, co-ordinated approach to food safety”

From our establishment in 2000, the core objective of the Coalition has been to see a national, co-ordinated approach to food safety more fully developed and implemented. We fully recognize that under our Constitution the jurisdiction for food safety is divided amongst the senior levels of government and in some cases delegated to the municipalities or other agencies within provinces and territories. However, our members and the agri-food businesses that they represent firmly believe that Canada should have one national approach to food safety.

Canadians, no matter where they reside or purchase their food, are entitled to the same level of assurances about its safety, assurances that should be based on common standards and expectations. A corollary of this statement is that agri-food businesses within each link of the supply chain should be asked to operate according to common standards and expectations within and amongst the responsible jurisdictions. Our expectation of imported food products should be, as a matter of course, the same as we would expect from our national system.

Our National Strategy sets out some very clear goals with respect to this Principle and a number of actions that need to be taken by governments, in co-operation with the agri-food supply chain and other interested parties, to realize “a national, co-ordinated approach to food safety”. These include:

- Revising the federal/provincial/territorial “vision” for a national approach to food safety (replacing the 1994 Blueprint) based on an agreed to set of principles (6.1);
- Establishing national (federal/provincial/territorial) decision-making mechanism for food safety policy and regulation in Canada (6.2);
- Clarifying the role and the scope of national codes, industry-led food safety programs, food safety objectives and other food safety requirements (6.3);
- Integrating food safety related discussions across departments within government (6.4) and,
- Opening lines of communication between government and industry groups in order to encourage collaboration on future evolution of food safety policy, objectives, systems, initiatives and programs (7.3).

We are aware that federal, provincial and territorial food safety officials have been discussing the development of a national food safety strategy since at least 2003 and that in February of this year the agriculture ministers requested a Food Safety Action Plan. We are also aware that this approach has been taken in Australia and within the European Union and that it is now under very active discussion in the United States. Models and best practices exist within federal systems with joint jurisdiction that can be studied and perhaps adapted to our needs.

We ask members of the subcommittee to strongly endorse this Principle – the establishment of a national, co-ordinated approach to food safety - in your final report and make clear recommendations about the process by which it could be achieved.

5. “Encouraging the implementation of HACCP and/or HACCP-based food safety systems by businesses all along the supply chain”

Starting in the early 1990’s Canadian agri-food businesses and their national associations have co-operated with governments to develop and implement HACCP and/or HACCP-based food safety systems.

You will be aware that Canada was a pioneer in the field of HACCP and a major contributor to the development of the international approach through the Codex Alimentarius Commission.

HACCP food safety systems have been implemented in federally registered establishments, in some provincial registered establishments and in larger, more complex non-registered establishments.

Federally, they most often use CFIA’s Food Safety Enhancement Plan approach. Provincially, there have been a number of programs created by the governments (e.g. HACCP Advantage, Alberta Advantage, etc). There is also an international standard for food safety management system (ISO 22000:2005) and a number of private standards that are used.

HACCP food safety system: Site (e.g. factory or other agri-food business) specific application of the Codex HACCP approach using a full hazard analysis (biological, chemical & physical) to identify all control measures (prerequisites and critical control points (CCPs)) needed to

Canada has also been a pioneer in the development of HACCP-based food safety systems for micro, small and medium-sized businesses that do not have the resources to develop and implement a site specific HACCP food system.

Smaller and less complex agri-food businesses rarely have the resources to undertake a site-specific hazard analysis and to develop and continuously update their food safety system internally. Industry associations have filled this gap by developing HACCP-based food safety systems and undertaking the on-going maintenance and updating of these based on the current science and new technologies.

Over the past 15 or so years, we have seen the members of the Coalition and other industry associations, working closely with both the federal and the provincial/territorial governments, to develop and implement ***national HACCP-based food safety programs*** for almost every segment of the supply chain.

HACCP-based food safety system:

Where the hazard analysis is generic (i.e. covers all producers or users in a given sector or commodity) and results in a list of commonly accepted hazards (biological, chemical & physical) and related controls that are then translated into a series of prerequisite programs (e.g. good agricultural practices (GAPs), good manufacturing practices (GMPs), etc) and critical control points (CCPs) to which users shall adhere.

For example, we now have twenty-two (22) national HACCP-based, commodity-specific on-farm food safety programs covering approximately 99 percent of primary production:

- Livestock (8) - hogs, cattle, dairy, sheep, bison, cervids (deer/elk), veal, goats;
- Poultry (6) - hatching eggs, hatcheries, table eggs (2 - layers & pullets), chickens, turkeys;
- Horticulture (4) - fresh fruits/vegetables², sprouts³, mushrooms, herbs/spices
- Grains, oilseeds, pulses & special crops (1)
- Honey (1)
- Aquaculture (2) – finfish & shellfish

For other segments of the supply chain, industry associations, using the very same approach as that pioneered by the primary production sector, have developed or are in the process of developing and implementing at least fourteen (14) national programs covering:

- Inputs suppliers (1): Feed mills
- Food Products (5): Bottled water, Brewers, Ice manufacturing, Vintners, Spices
- Distribution (5): Fresh produce repackers/ wholesalers, Grain handling, Retail distributors/warehouses, Retail stores, Food banks
- Services (3): Trucking⁴, Packaging⁵, Water & wastewater

The development of these initiatives has involved significant investments by individual agri-food businesses, by their industry associations and by the federal government first through the Canadian On-Farm Food Safety Program (1997 to 2004) and the Canadian Food Safety Adaptation Program (2000 -2004) and then through the Canadian Food Safety and Quality Program (2004-2009). And,

² For horticulture or fresh produce there are eight subprograms: potatoes; bulb and root crops; leafy vegetables and cruciferae; tree and vine fruit; small fruit; fruiting vegetables; asparagus, sweet corn and legumes; and, greenhouse production.

³ The sprouts program started as an industry-led initiative but was finally completed by CFIA and Health Canada.

⁴ The trucking program has 10 modules for different types of food product.

⁵ The packaging program has 6 modules for different types of packaging material.

so successful has this collaboration been, that governments have renewed their funding initiatives under Growing Forward and the recently announced *Canadian Integrated Food Safety Initiative*.

Industry-led HACCP and HACCP-based food safety systems are now an integral part of Canada's food safety approach. Canada has been and continues to be a world leader in their development and implementation. They are a necessary complement to the capacity of governments at all levels to engage in direct inspection and auditing activities.

Our Strategy document strongly endorsed continued investment by agri-food businesses, their associations and governments in the both the implementation of these systems and in their continuous improvement.

We ask members of the subcommittee to endorse this Principle - the implementation of HACCP and/or HACCP-based food safety systems by businesses all along the supply chain – in your final report and include recommendations to facilitate it.

6. “Food businesses, governments and other stakeholders have a responsibility to adequately resource, proactively manage, update, maintain and continually improve their individual and collaborative food safety systems and food safety initiatives.”

Establishing principles is a first step. Developing the tools that are needed for a co-ordinated national approach to food safety – whether they be industry-led, HACCP-based food safety systems for implementation by micro, small and medium sized agri-food businesses or HACCP systems for larger and more complex firms or government standards and oversight mechanisms – is clearly a challenge. But, ensuring that these systems are *adequately resourced, proactively managed, updated, maintained and improved* will be the real test of the Canadian approach to food safety.

Our National Strategy sets out a number of Goals and a set of associated Actions for industry, for other stakeholders and for governments in this area. These include:

- Promoting awareness of the Canadian food safety programs (Goal #2);
- Strengthening Canada's food safety training and auditing infrastructure (Goal #3);
- Increasing the pool of qualified food safety personnel (Goal #4);
- Establishing quality consistency across food safety specialists (consultants, trainers, etc) (Goal #5); and,
- Strengthening federal, provincial and territorial support for industry-led food safety initiatives (Goal #7).

We ask members of the subcommittee to endorse this Principle in your final report and include recommendations concerning the resourcing of government food safety initiatives and concerning the development of the infrastructure needed to ensure that industry activities can be updated, maintained and improved.

Conclusion

In conclusion the Canadian Supply Chain Food Safety Coalition would like to thank the Subcommittee for asking it to make this submission. Your inquiry into food safety comes at an important time in the evolution of the Canadian system. As we have discussed governments (federal, provincial and territorial) are actively considering new food safety initiatives. As parliamentarians you are expecting amendments to the Food and Drugs Act to be re-introduced in this session.

The recommendations that you make in June will have a major impact. We ask that you carefully consider our recommendations and the detailed contents of the National Strategy for Industry-led Food Safety Programs which we have tabled with you today. They represent a strong consensus on the part of the agri-food supply chain and of our members about the future direction of the Canadian food safety system.

As a final point, we would like to say on behalf of our members that the Coalition is ready to engage further with this subcommittee or with other committees of the House as changes are made to the Canadian food safety system.

Thank you