



CANADIAN SUPPLY CHAIN FOOD SAFETY COALITION
COALITION CANADIENNE DE LA FILIÈRE ALIMENTAIRE POUR LA SALUBRITÉ DES ALIMENTS

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

Preliminary Comments and Recommendations
submitted by the
Canadian Supply Chain Food Safety Coalition

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Table of Contents

- 1.0 Introduction**
- 2.0 Canadian Supply Chain Food Safety Coalition**
- 3.0 The Agriculture Policy Framework and Food Safety**
- 4.0 Food Safety in the Next Generation of Agriculture Policy**
- 5.0 Conclusions**

1.0 Introduction

The Canadian Supply Chain Food Safety Coalition and its member organizations welcome this opportunity to present their preliminary thoughts concerning food safety and the “next generation of agriculture and agri-food policy”. We appreciate the opportunity to participate in this initial round of consultations and look forward providing input in subsequent rounds and working with the federal, provincial and territorial governments in the finalization of the policy framework for agriculture and agri-food policy from 2008 forward.

As we have indicated these will be our preliminary thoughts. We understand that the governments will be circulating discussion papers on key themes as the consultations develop and we will engage our members in a dynamic dialogue based on this submission and the input of other groups and organizations with each subsequent round of consultations.

This brief is structured around the following subjects: some background information on the Coalition itself, a discussion of key elements of current food safety policy and programming in the context of the Agriculture Policy Framework and a set of recommendations concerning food safety and the next generation of policy and programming.

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 as a consequence, different approaches have been adopted by different players and the situation on the ground, here 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); and,
- co-sponsoring with federal agencies a workshop on pandemic preparedness planning (2006).

In addition to these very focussed events, the Coalition has 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. This relationship includes biannual conference call between the Coalition executive and the co-chairs of the FPT committees and regular consultations by both federal and FPT groups on policy items under development.

3.0 The Agriculture Policy Framework and Food Safety

The Canadian Supply Chain Food Safety Coalition welcomed the inclusion of a Food Safety and Food Quality Chapter (Section B, Clauses 19 to 22) in the 2002 Agricultural Policy Framework (APF) Agreement and appreciated the decisions taken by ministers to establish very clear sets of “common goals”, “targets and indicators” and “implementation measures” related to food safety.

The Coalition and its members were also encouraged by the commitment of the federal, provincial and territorial agriculture ministers and, subsequently, their health minister counterparts to “work with industry and consumers” in achieving these goals and targets.

In developing its preliminary views on the next generation of agriculture and agri-food policy and programming, the Coalition would like to briefly review some key elements of this Chapter. In doing so, we would note that all the goals, targets, etc related to food safety set out in the APF are important. However, some were identified from the outset as being of particular interest to the Canadian Supply Chain Food Safety Coalition and its members. These can be grouped as follows:

3.1 The APF: Actions Taken and Unfinished Business

3.1.1 Overarching Goals:

APF Commitment: *To increase consumer confidence in the safety of food produced in Canada (20.1.2); and To increase industry’s ability to meet or to exceed market requirements for food safety”(20.1.3);*

Prior to the Agriculture Policy Framework, the federal, provincial and territorial governments had laid out a Blueprint for food safety in Canada (www.cfis.agr.ca/english/homepage_e.shtml) based on “an integrated food inspection system responsive both to consumers and to industry”. The Blueprint was subsequently agreed to by Health Ministers. In the four and one-half years since the signing of the APF, the governments have not substantially added to or revised this vision. Indeed, the 1994 Blueprint is still considered by the FPT governments to be their detailed statement on food safety.

In 2003, discussions started within the federal government (Health Canada, AAFC and CFIA) on a new food safety strategy. This federal work was transformed into a federal, provincial, territorial initiative in 2005. The Coalition and its members were first consulted at an early stage in the process (May 2004) and updated again at our annual meeting in November 2005. Unfortunately, little seems to have happened in the intervening year and the initiative risks falling victim to the fate of many of its predecessor initiatives in food safety, either glacially slow movement or being frozen in time.

3.1.2 Governance:

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).*

The agriculture and agri-food industry, including the Coalition's members, were encouraged by the ministers' APF commitments to move forward on new governance structures, integrated decision-making, legislative harmonizations, etc. Why were we encouraged? Quite frankly because the current system does not serve the public good nor meet industry's needs. Improvements in organization, efficiency and accountability are required.

Over the past twenty (20) years, governments have established a number of committees at the government officials level that were charged with responsibility for one aspect or another of food safety policy or regulatory development. These include the FPT Committee on Food Safety Policy (FPTCFSP), mandated health ministers in 1986, the FPT Agri-Food Inspection Committee (FPTAFIC), mandated by agriculture ministers in 1989, and the Canadian Food Inspection System Implementation Group (CFISIG), created in 1994 by agriculture and health ministers to implement the Blueprint.

While, as noted above, the Coalition has established a positive working relationship with these committees and appreciates that it has been invited to facilitate consultations with industry on several new initiatives, we have some very serious concerns about the mandates, effectiveness and accountability of these committees. Indeed, these concerns have been the central focus of the Coalition's major events - the 2001 and 2002 symposia and the 2004 industry/government forum. At each of these events, the Coalition focussed the attention of industry leaders and senior FPT government officials on the innovative and potentially "best practices" developed by other countries to deal with food safety policy development, in particular the Conference for Food Protection in the United States and the new food safety policy and regulatory system in Australia. In both these examples, innovation in the context of shared national/sub-national joint jurisdiction over food safety, has led to greater harmonization and more integration of food safety policy and regulations.

Unfortunately, in the four and one-half years since the signing of the APF, governments have not made any visible progress in meeting their goals respecting the governance system for food safety. 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 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 and, possibly other stakeholders.

3.1.3 Development and Implementation of Industry-led Food Safety Programs:

APF Commitments: To work with industry towards the development and implementation by industry (on-farm and post-farm) of government-recognized food safety process control systems throughout the agri-food continuum (20.2.1, 21.1.1, 21.1.2), to offer funding, program and technical assistance to facilitate

industry development and implementation of process control systems recognized or to be recognized by government (22.1.1); and to introduce measures to facilitate the development by industry of food safety training materials and appropriate training courses (22.1.2).

The Coalition would like to congratulate governments for following through on their APF commitments respecting the encouragement and funding of industry-led food safety programs. The continuation of the partnership established between national industry associations, on-farm and post-farm, with AAFC prior to the APF and the major federal commitment to funding the development of these programs under the new Canadian Food Safety and Quality Program has been appreciated.

These industry/government initiatives have also led to some very positive results. Members of the Coalition and other organizations have engaged their members in the development HACCP-based programs that complement the existing inspection based initiatives for the processing sector in dairy, meat, poultry and fish/seafood. Most, but not all, of the gaps in the availability of process control systems along the supply chain have been or are now being filled. That is a major accomplishment and it has the potential to position Canada as a world leader in food safety.

Implementation of these HACCP-based programs and of those specifically targeted at food businesses that wish to develop site-specific HACCP programs has, however, proceeded much less smoothly. The funding programs for both On-Farm Implementation and for the Food Safety Initiative in the five participating provinces took too long to be established and, in the case of the former led to an overly complex application and funding process.

Improvements to these programs, both in their administration and to extend their scope have been identified by industry groups and the Coalition's members.

Indeed, if there is a general concern about the government programs related to development and implementation, it is that they have become too bureaucratic. Applications for similar program funding prior to the APF (i.e. under the Canadian On-Farm Food Safety Program or the Canadian Food Safety Adaptation Program) 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:

APF administrative processes are very complex and burdensome Measures should be taken to minimize delays when programs are introduced or changed. 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)

From the Coalition's perspective, the primary target for implementation funding assistance should be micro, small and medium sized businesses all along the food supply chain. These firms require financial assistance to ensure that they have an opportunity to meet the new requirements that consumers, governments and the market are setting with respect to the implementation of formalized programs of food safety process controls. Governments should take a balanced approach to implementation funding so that all types of food business, on-farm and post-farm, have access to assistance.

3.1.4 Government Recognition of Industry-led Programs:

APF Commitment: To establish a credible and co-ordinated system that allows for recognition by Canada of food safety process control systems, the administration of which could be done in collaboration with the Parties, including the completion of the design for a national recognition system for on-farm food safety programs by the end of 2003 and the expansion of government recognition to other sectors in the agri-food continuum as requested (22.1.3);

The Coalition would like to congratulate governments on the progress, albeit limited, that has also been made in the area of government recognition of these industry-led HACCP-based food safety programs. 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 mid-2007, ten (10) years after it was originally identified as an issue and eight (8) after government negotiations with industry commenced in February 1999. The Coalition appreciates that this unique and world leading recognition program has been implemented in a phased manner. This has ensured that the on-farm programs that were ready have had access to a process to review first the technical soundness of their programs and then to assess their management system documentation against the agreed to government requirements.

Progress on the establishment of parallel approach to recognizing the programs developed by the post-farmgate industry associations is now not expected to be initiated until early 2007. It is to be hoped that the discussions between industry and government will not take as long. Indeed, it should be possible to make this new program fully operational prior to the conclusion of the APF in March 2008. Several of the Coalition's members have expressed strong interest in participating in the design of this program and are ready to start work now.

3.1.5 Traceability:

APF Commitment: The development by industry of traceability systems and traceability components for all products/commodities within the food safety control systems which would allow for eighty (80) per cent of domestic products available at the retail level to be traceable through the agri-food continuum (21.1.4, 21.1.5)

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. Our members have also indicated that they appreciated the opportunity that this initiative provided

them 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. There may, in future, be a need to provide a mechanism for such discussions within the supply chain and between it and governments.

4.0 The Next Generation of Food Safety Policy

The purpose of this initial round of consultations is to seek early input into the development by the federal, provincial and territorial governments on their next generation of policies and programming for the agriculture and agri-food sectors. The Canadian Supply Chain Food Safety Coalition is pleased to present the following preliminary recommendations:

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

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

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.

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.**

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 timeframe for the conclusion of these discussions.

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.**

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.**

8. In the meantime, under the current AFP, the 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;**
- **developing the national infrastructure of accreditation of food safety management systems (e.g. requirements for certification bodies) and the requirements for the training of food safety auditors by the end of 2007.**

8. The next generation framework should also include a significant increase in the public funding of consumer food safety education. Industry and government have collaboratively supported the establishment of consumer food safety education programs since 1997, 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.

5.0 Conclusion

In closing, the Canadian Supply Chain Food Safety Coalition would like to express its appreciation for this initial opportunity to participate in the development of the food safety components of the Next Generation of Agriculture and Agri-Food Policy. This brief includes the preliminary comments and recommendations of our members. They are looking forward to hearing the views of governments and other stakeholder and to making further comments and recommendations as the consultation process moves through its second and final stages.

Thank you

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Secretariat
on behalf of the Executive Committee