



**CANADIAN SUPPLY CHAIN FOOD SAFETY COALITION**

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**COALITION CANADIENNE DE LA FILIÈRE ALIMENTAIRE POUR LA SALUBRITÉ DES ALIMENTS**

20 April 2017

Dr. Richard Arsenault, Executive Director  
Domestic Food Safety Systems and Meat Hygiene Directorate  
Canadian Food Inspection Agency  
1400 Merivale Road, Tower 1  
Ottawa, Ontario K1A 0Y9

Email: [CFIA-Modernisation-ACIA@inspection.gc.ca](mailto:CFIA-Modernisation-ACIA@inspection.gc.ca)

Dear Dr. Arsenault:

**Comments on the Proposed Regulations under the Safe Food for Canadians Act –  
Published in the Canada Gazette Part I on 21 January 2017**

The Canadian Supply Chain Food Safety Coalition appreciates this opportunity to comment on the Proposed Regulations under the Safe Food for Canadians Act published in the Canada Gazette, Part I on 21 January 2017.

Over the past three years we have had the opportunity to comment on two drafts of these proposed regulations, one partial draft in 2014 and one full draft in 2015. Our involvement in this initiative goes back further, to 2011, when the government of Canada initiated consultations on the proposed Act. Throughout this long gestation period, we have appreciated the openness with which the Agency has approached these consultations and the willingness that it has shown to make improvements in the draft regulations.

However, as we have strongly indicated since the publication of the first partial draft of the regulations in 2014 there are issues that must be resolved prior to the final publication of these proposed regulations in the Canada Gazette Part II.

In this submission we are recommending numerous changes. Some of these recommendations involve major amendments which could necessitate the re-publication of the proposed regulations in the Canada Gazette Part I. The Coalition urges the Minister and the Agency to take the extra time necessary – we estimate six or so months – to make these changes.

The alternative is to make only cosmetic changes to what was, even in 2015, recognized by the Agency as an imperfect draft. Over the past six (6) years while the Act and the proposed regulations have been in development, the Agency has often indicated that there would be several rounds of regulatory activity. The current proposals were always identified as Round 1. Improvements could

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be made in Round 2. The Coalition prefers that the improvements be made now – that the job be finished and done right this first time.

We fully expect the Agency to respond to our comments and to those of other stakeholders as, together, we shape the federal food safety regulatory regime for the next several decades. Opportunities such as we have now come rarely the government should seize it to ensure that Canada's food safety regulations are, indeed, world class.

Should you and your colleagues have any questions about our recommendations, please do not hesitate to contact me. And, Coalition and its member organizations would like to assure you and the Agency that should there be further opportunities to assist in the final drafting of these regulations, prior to their publication in the Canada Gazette, Part II, we would be willing to assist.

Sincerely,

A handwritten signature in black ink, appearing to read "Albert F. Chambers". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Albert F. Chambers  
Executive Director

Attachment:

Cc: Mr. Paul Glover, President, CFIA  
Ms. Kathryn Nowers, Policy Advisor, Office of the Minister of Health  
Members, Canadian Supply Chain Food Safety Coalition