



30 October 2007

The Honourable Gerry Ritz  
Minister of Agriculture and Agri-Food  
Government of Canada  
9th Floor, Sir John Carling Building  
930 Carling Avenue  
Ottawa, Ontario  
K1A 0C5

*Delivered electronically*

Dear Mr. Minister:

**Re: *Growing Forward* and the Canadian Approach to Food Safety**

On behalf of the Canadian Supply Chain Food Safety Coalition, I would like to congratulate you and your colleagues for continuing to recognize the importance of food safety in the *Growing Forward* initiative.

Food safety is a matter of considerable interest to all Canadians. The Canadian agriculture and food industry recognizes that it has a definite role to play alongside governments and consumers in assuring food safety. Indeed, as recent incidents in Canada, the United States and around the globe have demonstrated, the only sound approach to food safety is one that covers the entire supply chain, including consumers.

The Canadian Supply Chain Food Safety Coalition was established by industry in December 2000. It currently represents national, provincial and local organizations serving all segments of the food 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”*.

During the *Growing Forward* consultations, the Canadian Supply Chain Food Safety Coalition put forward a number of priorities and recommendations for food safety. The June 29th *Growing Forward* ministers' communique included several of these, such as a continued identification of food safety as a priority, the recognition the role of industry in food safety and a commitment to moving forward on the basis of government/ industry partnerships. In addition, your governments have recently acted on industry's recommendations to streamline the number of intergovernmental committees dealing with food safety and to establish clearer and more direct lines of accountability from these to ministers. We welcome these high level policy statements and the structural changes. We also understand that the June 29th communique was a progress report on your discussions and that you are currently working on the final document.

It is in this context, that we would like to restate the following recommendations as priorities for your consideration at the November ministers' meeting:

**Recommendation 1. *As part of the Growing Forward initiative, the federal, provincial and territorial governments should commit to engaging the food supply chain and consumers in a focussed review during 2008 of the national food safety strategy and the development of 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 2. *That the final Growing Forward agreement include a strong commitment to greater harmonization of food safety policies and regulations across jurisdictions in Canada.***

Harmonization 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 governments 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; and,
- co-operate in the establishment of competency-based national examinations to permit multiple training options and labour mobility.

The three levels of government could initiate and conclude within a realistic timeframe, discussions with industry and other stakeholders on the establishment of a new and effective food safety decision-making mechanism. When contrasted with the collaborative governance systems for food safety that are 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 3. *That the communiqué from your Growing Forward meeting in November include an announcement of both transitional funding for 2008 and continued funding through 2013 for the development of the infrastructure required to support industry-based food safety and traceability programs and for increased implementation assistance for micro, small and medium-sized businesses all along the supply chain.***

The revised government funding programs should provide:

- 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 or completed this work;
- assistance, as a long-term commitment in the context of the public good, for the updating of these national food safety programs and the administrative services required to sustain them; and,
- increased implementation assistance for micro, small and medium sized businesses within all segments of the supply chain, not just primary production.

The announcement of transitional funding for 2008 will provide existing industry-led initiatives with the assurance they need to maintain their development and implementation work beyond 28 February 2008. Without transitional funding for all or a major part of 2008/9, these initiatives will be terminated or cutback severely.

**Recommendation 4. *The revised funding programs under the Growing Forward initiative must also be streamlined and made more 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.***

**Recommendation 5. *That the new Growing Forward initiative 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 programs that many governments and food businesses operate on 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 dollars. 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.

**Recommendation 6. *That to ensure continuity with the Agriculture Policy Framework, governments need to make a priority of the following infrastructure initiatives over the next 15 months:***

- ***completing the development of the official recognition program for on-farm food safety programs by the end of 2007;***
- ***fast tracking consultations with industry to expand the official recognition program for HACCP-based food safety programs to the post-farm segments of the supply chain by April of 2008; and,***
- ***developing other components of the national infrastructure for food safety management systems, including the requirements for the training of food safety auditors by the end of 2008.***

The Canadian agri-food industry is confident that the *Growing Forward* initiatives will provide a common vision of a profitable and innovative agriculture, agri-food and agri-based products industry and a comprehensive, outcome-based policy framework that focuses on clear objectives and on the strategic investment of public funds. The members of the Canadian Supply Chain Food Safety Coalition are looking forward to the results of your meeting in November to clarify governments' directions with respect to food safety policy, programming and public investment.

We trust that our recommendations and suggestions will be of assistance to you and your colleagues as you complete work on this important initiative.

Sincerely

A handwritten signature in cursive script that reads "H. Holland".

Heather Holland  
Chair

cc: Members, Canadian Supply Chain Food Safety Coalition  
Federal, Provincial and Territorial Deputy Ministers of Agriculture