



**CANADIAN SUPPLY CHAIN FOOD SAFETY COALITION**

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

18 April 2018

Honourable Ginette Petitpas Taylor, M.P. P.C.  
Minister of Health  
House of Commons  
Ottawa, Ontario  
Canada K1A 0A6

Delivered electronically: [Ginette.PetitpasTaylor@parl.gc.ca](mailto:Ginette.PetitpasTaylor@parl.gc.ca)

Dear Madame Minister:

**Re: Safe Food for Canadians Act – Government commitment to completing the modernization of Canada’s food safety regulatory regime**

Thank you very much for your letter of 22 March 2018 and the assurance that the Government of Canada intends to publish the regulations under the *Safe Food for Canadians Act* in the Canada Gazette Part II “within the year”. This assurance is encouraging.

Throughout the more than 10 year development process for these regulations, the Canadian Supply Chain Food Safety Coalition has championed this objective and advocated the development of a world class food safety regulatory regime that will meet the needs of our industry, Canadian consumers, international customers and our trading partners. We have advised you and your predecessors that this should be done right the first time and done as quickly as possible. For at least three years, officials at the Canadian Food Inspection Agency have signalled that not everything we were looking for might be accomplished in a “first round” of regulation making and that a second round would follow shortly.

The Coalition on behalf of its members would like firm assurances from you, as Minister, and from the Government of Canada that a “second round” of legislative, regulatory and policy initiatives will be announced and commence this year, immediately upon the publication of the revised proposed regulations in the Canada Gazette Part II.

The proposed regulations will move the Canadian regulatory regime forward significantly. The drafts we have commented on in 2014, 2015 and 2017 would bring Canada’s food safety regulations much closer to industry best practices and the regulatory requirements in the United States of America and the European Union – two of our major trading partners. The proposed regulations also include other changes that will permit Canada’s food businesses to be more innovative and more competitive in both the domestic and international marketplaces. However, the proposed regulations, as we understand them, will not achieve all our objectives nor make Canada’s food safety regulatory system fully comparable with the systems of other trading partners. Further improvements are required.

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**19 Elm Street, Ottawa, Ontario K1R 6M9**

**T: (613) 233-7175 E: [cscfsc@monachus.com](mailto:cscfsc@monachus.com)**

**[www.foodsafetycoalition.ca](http://www.foodsafetycoalition.ca)**

The formal commitment we are seeking from you and the government concerns the content of these improvements and the process and timetable for developing them. We have identified the following ten (10) components for a second round, to be initiated and completed, if possible, over the short or over a longer term.

#### Short term components for completion by the end of 2019

1. Completing the federal legislative framework for the outcomes-based food safety approach by revising Section 4(1)(a) of the *Food and Drugs Act* to ensure comparability with the similar provisions of the US *Food, Drugs and Cosmetics Act* for naturally occurring contaminants that do not pose a health hazard.
2. Correcting problems that may be unforeseen or unintended or may not fully reflect the government's initial intentions when these are identified with the first set of *Safe Food for Canadians Act* regulations as finally published.
3. Expanding the scope of the *Safe Food for Canadians Act* regulations to cover the full supply chain by including excluded sectors (e.g. third-party transportation, third party storage, etc.).
4. Revising the 'outcomes-based' regulations by updating preventive controls and preventive control plan requirements to meet industry best practices and the tests of comparability with Canada's major trading partners (e.g. US FSMA requirements, etc.)
5. Ensuring that HACCP-based preventive control plans developed using the requirements of programs recognized by the Canadian Government Food Safety Recognition Programs are considered by CFIA inspectors as equivalent to plans developed using a site-specific hazard analysis.
6. Developing a federal policy in collaboration with industry on the concepts and use (e.g. when or if) of Food Safety Objectives and of "below detectable limits".
7. Establishing within the Health Portfolio an effective, ongoing industry advisory forum or committee on food safety policy and regulations including regular scans of global initiatives.

#### Longer term components for completion by the end of 2020:

8. Completing the updating of the Canadian Government Food Safety Recognition Programs and securing their place in Canada's food safety regime.
9. Establishing common public / private sector competencies for food safety inspectors, food safety auditors and other personnel, related training opportunities and career-based competence recognition systems/frameworks to ensure effective implementation of the new food safety regulatory regime, industry best practices, etc.

Finally, we would like the you and the government to act on the commitment that the Coalition received from your predecessor, Minister Philpott, during our meeting with her on 26 February 2016. The Minister indicated that she would initiate, within the year, consultations with her federal-provincial-territorial Ministerial colleagues:

10. On the establishment of a common, “national” approach to food safety regulation in Canada built on the *Safe Food for Canadians Act* regulations so that Canadians, no matter where they reside or purchase their food, have the assurance, based on common standards and regulatory expectations, of its safety.

We appreciate that these components are significant and will require resources to accomplish them. All of them have been flagged in previous industry-government consultations and meetings. They are all, in our view, essential if Canada’s new food safety regime is to both be, and be seen to be, world class.

We look forward to an opportunity to discuss a government commitment to an imminent second round of legislative, regulatory and policy initiatives with you or with your officials at your earliest convenience.

Sincerely

A handwritten signature in black ink, appearing to read 'Albert Chambers', written in a cursive style.

Albert Chambers  
Executive Director

Cc: Honourable Bill Blair, M.P., Parliamentary Secretary to the Minister of Health  
Mr. Simon Kennedy, Deputy Minister of Health  
Mr. Paul Glover, President, Canadian Food Inspection Agency  
Ms. Colleen Barnes, Associate Vice President, Policy and Programs, Canadian Food Inspection Agency  
Ms. Karen McIntyre, Director General, Food Directorate, Health Canada  
Mr. Travis Gordon, Policy Advisor, Office of the Minister of Health  
Members of the Canadian Supply Chain Food Safety Coalition.