

Review of the Meat Inspection and Regulatory Regimes in Ontario

March, 2004

OCA cooperated with other agricultural organizations to prepare and submit the following paper to Justice Haines who is leading an Ontario-wide review of the province's meat inspection system. On April 1, 2004, OCA Vice President Ian McKillop and OFA Executive member Paul Mistele, made a presentation to Justice Haines at a public hearing in London.

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A submission on behalf of Ontario farmers as represented by:
The Ontario Cattlemen's Association, Ontario Sheep Marketing Agency, Ontario Pork Producers' Marketing Board, Chicken Farmers of Ontario, Turkey Farmers of Ontario, Ontario Veal Association, and The Ontario Federation of Agriculture

Collectively, the organizations listed above represent the interests of Ontario livestock and poultry farmers who supply the products under the purview of Ontario's meat inspection and regulatory regime. The livelihood of our farmers and, in fact, the well being of rural Ontario is affected by the availability and viability of provincially inspected meat processors, who, in turn, are affected by the inspection system and any proposed changes.

For these reasons, the organizations (collectively, the "farmers") respectfully submit their views and suggestions on Ontario's meat inspection system to The Honourable Justice Roland J. Haines.

Food Safety Systems:

Notwithstanding recent highly publicized events, Ontario has an enviable record of food safety owing, in part, to a well-developed and functional meat inspection system.

Ontario farmers are actively engaged in the development and implementation of HACCP-based on-farm food safety programs. Such programs will further enhance the safety record and consumer confidence. However, farmers fully recognize that all participants in the food chain are responsible for the safety of the product provided to Ontario consumers.

Each sector in the food chain must be responsible for preventative measures, like HACCP-based systems, to ensure increasingly safe products for our customers. In this regard, farmers congratulate the Ontario government for announcing OMAF's HACCP Advantage program, enabling non-federally registered plants to develop, on a voluntary basis, comprehensive, in-plant food safety systems.

Farmers recommend that a suitable level of financing be available for plants implementing the HACCP Advantage program on a voluntary basis. Small processing facilities, in particular, will likely not have the technical capacity to implement HACCP planning without training and financial support.

Farmers also continue to emphasize that the food safety continuum includes the consumer. Commodity organizations and government must continue to educate consumers on proper food handling and storage techniques to minimize at-home food illness incidents.

Government must also continue to support mandatory Food Handler Training programs for those working in the food processing and food service industries. Incidents of improper handling, storage and hygiene leading to contamination can be significantly reduced through proper education. Consideration must be given to encouraging the adoption of training through continuation of the training fee offset, which terminates at the end of March.

Inspection Services:

Farmers concerns with inspection services relate mostly to its reliability. Regulations require inspection and inspectors. Continuous availability of inspection services is important to processors and therefore, to those supplying processors.

Availability relates to year-round availability (i.e. no work disruptions such as in 1996) as well as time-of-day availability to suit an efficient processing schedule. Flexibility in scheduling inspection staff will be important to enable small and large processing plants to run efficiently.

Farmers view meat inspection as a public good. Particularly as farms and the supply chain develop preventative HACCP systems, government inspection service only provides the final check on meat products, to the benefit of the consuming public.

Universal meat inspection costs cannot be borne by industry and certainly not by farmers. Government must continue to adequately fund a public meat inspection system.

Economic Impact:

The viability of a multitude of meat and poultry processing businesses provides a significant economic benefit to farmers and rural Ontario. A December, 2002 SWOT Analysis performed for the Ontario Cattlemen's Association identified the number of small meat processors in Ontario as one of the province's strengths.

The Prime Minister's Caucus Task Force on the Future of Farming, chaired by now Minister Bob Speller identified lack of competition in the processing sector as a national problem. Farmers in Ontario have recently witnessed, first hand, the impact of the lack of processing facilities. Farmers are intent on ensuring it does not become a larger problem with particular concern for the small processing facilities.

Farmers recognize the benefit of small processors directly on a daily basis. The availability of a nearby abattoir in rural Ontario not only provides much needed competition in the processing industry, but also contributes directly to the local tax base and economy, enables and encourages the development of niche marketing opportunities and provides a convenient and safe service for personal consumption needs.

Farmers are, therefore, calling on government to ensure, at least, that the regulatory regime does not further burden small processing facilities across rural Ontario. Government policy and programming should, in fact, assist and encourage meat and poultry processing facilities by assisting with adjustment to food safety regulations, training opportunities and accommodating inspection services.

Another aspect of economic effect relates to the present inconsistencies in meat inspection services and authorities across Ontario and across provinces.

Farmers strongly suggest a review of the present meat inspection legislation that excludes meat processing facilities that do not slaughter. This anomaly of splitting the jurisdiction for very similar enterprises across OMAF and public health officials, is suspected of leading to compromised inspection and safety, while conferring differing economic advantages across similar businesses.

It is suggested that a uniform approach to address meat inspection and regulations, falling under the authority of the Ontario Ministry of Agriculture and Food would provide positive benefit.

The Ontario meat inspection system is recognized across the country as the benchmark system. For a number of years, Ontario has worked with its fellow provinces to seek development and recognition of a National Meat and Poultry Code, based mostly on the Ontario system.

Such a national code would provide economic opportunity in enabling interprovincial trade in Ontario's meat and poultry products, processed in provincial plants. It would open access to national chain distribution and again, further the development of the provincial processing sector. Ontario farmers see positive benefit in the development and adoption of the national code.

Conclusion:

The decision of the Ontario government to review the Ontario meat inspection system is seen as a potential opportunity for Ontario consumers, farmers and the meat and poultry processing industry.

The suggestions made above address identified weaknesses as well as areas that could be capitalized on, in the present regime. Adoption of these suggestions will serve to support the processing sector to the benefit of Ontario consumers, processors and farmers.

Over 30,000 Ontario farmers are involved in livestock and poultry production. The economic basis of rural Ontario is very closely tied to the well-being of these farm operations. However, the production sector can only be healthy if its buyers are plentiful and viable.

In this sense, Ontario farmers urge the Ontario government, through Justice Haines to engage in productive and positive change to the Meat Inspection system as suggested above.

Respectfully submitted,
OCA, OSMA, OTPMB, CFO, OPPMB, OVA, OFA