



LONG-TERM THINKING FOR TODAY'S ISSUES

October 19, 2021

Honourable Lisa Thompson, MPP
Ministry of Agriculture, Food and Rural Affairs
77 Grenville St. 11th Floor
Toronto, ON, M7A 1B3
Delivered via email to: minister.omafra@ontario.ca

Ontario Meat Processing

Dear Minister Thompson,

We appreciate the many efforts your government has put forward to support small processors. This includes programs to address issues arising from COVID-19, as well as Canadian Agricultural Partnership (CAP) funding to support sector innovation and growth, efficiency improvements, update equipment and increase safety.

The CFFO has been pleased to participate in consultations, including meetings of the Livestock Processing Capacity Working Group. We are grateful for government interest in the challenges and potential solutions to support this sector.

We are also pleased to read about the establishment of the Meat Industry Engagement Panel. This is another example of how your government is effectively engaging with industry to find workable and effective solutions. We applaud these efforts and look to the Meat Industry Engagement Panel initiative as a source of solutions and improvements for the industry.

We would also like to reiterate the CFFO's support for food safety and the regulations in Ontario that protect the public and the reputation of the entire food system. Food safety is best achieved when the entire system is working together toward this shared goal.

We appreciate the detailed and thoughtful response you sent on August 11, 2021, to our letter. We wish to reply to that letter and emphasize some key recommendations for improving this sector, including:

- single process for building plan approval and inspection by all interested parties
- templates or standard accepted designs for abattoirs and meat processing plants
- more OMAFRA inspection time to increase kill time for existing operations
- broader and more effective appeal process
- process of review of inspection results that require operators to spend over a set amount on minor improvements to facilities
- culture of partnership between inspectors and processors to jointly steward Ontario-produced meat to consumers
- investment in training for existing employees and operators

New Entrants and Expansions

The CFFO wants to increase new entrants into the provincially inspected meat processing sector. We hope our suggestions will help facilitate new businesses to get off the ground.

We are pleased to read in your response letter that a process does exist for entrepreneurs to receive an “appears to meet” letter from OMAFRA on new builds or expansion projects. However, as your response acknowledges, this letter “is not a licence to operate” and operators are still responsible “to ensure the proposed meat plant complies with all other applicable legislation.” This means that, while this is a required step, success in getting an “appears to meet” letter does not ensure a successful overall outcome for the entrepreneur.

This review process should include steps to ensure other applicable legislation or local building codes are also addressed so that an entrepreneur has more confidence in moving forward with approved building plans. Ideally, there would be a single process for approval of building plans that would include all interested parties in a “one window” type system.

For those new operations building from the ground up, we also recommend that OMAFRA consider having templates or standard accepted designs for abattoirs and meat processing plants that entrepreneurs could choose to use as a way to get started.

Expanding Existing Capacity with More Inspection Time

Part of expanding the overall processing capacity of the sector will require more OMAFRA inspectors and inspection time to increase kill time for existing operations. This is an effective way to increase capacity without adding new facilities. Lack of access to OMAFRA inspectors can limit killing capacity and thus limit growth potential for individual operations and for the sector as whole.

Fair Application of Regulations

Regulations and inspections should be focused on achieving desired food safety outcomes. Food safety is best achieved when food safety rules are fairly applied through the inspection process. Two of our key recommendations, for a process of appeal and a process of review, attempt to address the issue of fairly applying food safety regulations.

The current process for appeal and for a hearing is limited in scope. The inspection process is prone to human error. This is why checks and balances need to be in place, such as broader access to appeal. A more effective appeal process will continue to ensure food safety, while also increasing fair treatment of all meat processing entrepreneurs.

Your letter did not address our recommendation for review of inspection findings that require an operator to spend above a set amount of money on minor facility improvements. Here again we emphasize focusing on the desired food safety outcome and fair application of the rules. Small businesses should not be unduly burdened with costs when a lower cost option may achieve the same food safety outcome.

We appreciate your comments that “OMAFRA is committed to an open dialogue with operators.” This spirit of openness and the ongoing work of the Meat Industry Engagement Panel should keep the door open to finding improvements.

Joint Stewardship of Ontario-Produced Food

Food inspectors and meat processing entrepreneurs should be viewed as partners working together as stewards of Ontario-produced livestock to get as much as possible safely to consumers. The goal should be to ensure food safety with a minimum of food waste. The inspector role needs to be redefined as helping to maintain safety through the value chain, with a goal to get Ontario-produced meat onto Ontario tables.

The CFFO recommends that a culture change is necessary in the inspection process. The current practice of punitive escalation of enforcement against operators is especially concerning. Instead, we recommend that the inspection process should be a partnership working towards the shared food safety outcome.

To this end, we recommend training for both inspectors and entrepreneurs on making the inspector/business owner relationship more cooperative. For example, part of the inspection process should include identifying positive aspects of how an operation is doing well with food safety.

Education and Training

Abattoir operators are food safety conscious as part of their profession. Ultimately, people ensure food safety. That means that investment in employee training may be as important as improving equipment. Training materials that are easily accessible, such as short videos, would be useful tools for small operators to keep staff up to date.

The CFFO recognizes that increasing food literacy needs to be a joint effort between industry and government. The CFFO supports AgScape and Farm & Food Care Ontario, which were both highlighted in the “promoting local food literacy” section of [Ontario’s Local Food Report, 2020 edition](#). We are pleased to see the two weblinks you included to help promote jobs in the agriculture and food processing sectors, one from government and one from industry.

We reiterate again our support for Meat and Poultry Ontario’s Growth Strategy, including recommendations it includes for greater leadership development among current operators, training for new and current workers, and a proposal for a centre of excellence as a key aspect of innovation and education for this sector.

Summary

We recognize the significant efforts your Ontario government is making to engage with industry stakeholders; to support safety, growth and innovation; and to collaboratively support this sector. A thriving provincially inspected meat processing sector benefits livestock farmers and local consumers, while contributing to our overall economic growth and food security across the province. We hope to continue to work collaboratively to build success for this sector.

We emphasize the potential benefits of a single pre-approval process of plans for new builds and expansions, templates for new abattoirs and meat processing facilities, increased inspection time to increase kill time for existing operations, broader access to appeal and a process of review when minor

improvements over a set cost are required. Education and training are also key to building leadership and skilled workers for this sector.

The CFFO strongly encourages a culture of partnership between inspectors and processors to jointly steward Ontario-produced meat safely to consumers.

Thank you for your consideration of our input.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ed Scharringa', with a stylized flourish at the end.

Ed Scharringa, President
Christian Farmers Federation of Ontario