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LONG-TERM THINKING FOR TODAY'S ISSUES

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April 27, 2021

Honourable Ernie Hardeman, Minister  
Ministry of Agriculture, Food and Rural Affairs  
77 Grenville St. 11<sup>th</sup> Floor,  
Toronto, ON, M7A 1B3  
Delivered via email to: [minister.omafra@ontario.ca](mailto:minister.omafra@ontario.ca)

## Ontario Meat Processing

Dear Minister Hardeman,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

### Importance of Small Processors in Ontario

Small and medium-sized processors operating under provincial inspection are entrepreneurial businesses often operated at a family scale. These entrepreneurs are putting their family equity into their operations and are thus deeply invested in running successful businesses.

Small and medium processors are not the same as larger processors. They serve different markets and operate at a very different scale. Each one is a unique business, forming a vital connection between livestock farmers and consumers. Policies governing and supporting these businesses need to recognize their particular character and role.

The CFFO has some key recommendations to support these vital businesses now and into the future. In particular, we outline several recommendations to mitigate the risk to new and operating entrepreneurs within this sector. We also emphasize the importance of education in improving the social value placed on butchering as an artisan skill.

In preparing these recommendations, the CFFO has consulted with meat processing entrepreneurs and with the abattoir industry. Stakeholders identified these major hurdles facing small and medium processors. We believe the potential economic growth that could be generated by correcting these issues will outweigh the expense. We see significant benefits for both farmers and small processors in having these issues addressed.

### Mitigating Risks to Entrepreneurs

The province can help to mitigate the level of risk to meat processing entrepreneurs in establishing new businesses, expanding existing businesses and ensuring the ongoing safety and success of these businesses day-to-day. In particular, we recommend:

- **New Operations and Expansions** – a pre-approval processes for new licenses to operate and for building plans of new facilities or expansions.
- **Process of Appeal** – an independent third-party ombudsman committee to hear appeals of inspection findings.
- **Process of Review** – a mandatory review (by a peer or superior) of any inspection results that require operators to spend over a set amount on minor improvements to facilities.

#### New Operations and Expansions

Currently, food safety and licensing approvals for new operators, new processing facilities and expansions come only after the building has been completed and significant investments have been made in starting or expanding a business. The CFFO recommends that a pre-approval process be established both for licensing of new operators and for plans for new buildings and expansions.

New operations require both approval of the processing facility and a license to operate. Pre-approval for both of these would be especially beneficial for new businesses in order to bolster applications to financial institutions. Having a process to approve designs and plans gives new business operators greater confidence in the direction they are taking and in the likely success of their personal investments.

Currently there is no way to submit plans for new builds or expansions for review and pre-approval. Nor are there templates, pre-approved plans or standard accepted designs for establishing new abattoirs or meat processing businesses. A process for pre-approval of plans would be highly beneficial.

In the process of building or expanding, conflicts may arise between the requirements for food safety and other building code or safety requirements such as for fire codes or other local-level approvals. It is extremely costly and frustrating for entrepreneurs who have made significant investments to create or expand a facility to then face added costs and delays when further changes are required. Without a pre-approval process, there is no way to find out about these issues until after the facility is built. These delays and costs could easily be avoided if designs, plans and required materials could be approved before construction begins, with final approval given through verification that the constructed building meets with the approved plans.

#### Process of Appeal

Small processors share government concerns about the importance of food safety at all meat processing facilities. In many cases, these small business operators deal with farmers and customers face-to-face, so the success of their business and their personal reputation are on the line in the community where they live, should anything significant go wrong.

In any process where there is opportunity for human error, it is important to have checks and balances in place. We recognize the value of regular inspections. At the same time, there need to be checks and balances within that inspection process, namely, an ombudsman committee where operators have the option to appeal inspection findings and recommendations.

The CFFO recommends an independent third-party ombudsman committee of at least three people be established. There would need to be rules outlined for grounds for appeal and timelines for decisions to ensure risks to both food safety and to businesses are mitigated in the overall inspection and appeal process.

## Process of Review

Where minor improvements to facilities are required to correct issues, possible solutions can vary considerably while still achieving the same desired food safety outcome. Often in this situation, costs to the operator can be considerable. The CFFO recommends that there should be a mandatory review (by a peer or superior) for inspection results that require operators to spend over a set amount to make minor improvements to facilities. This review process should take into consideration the least costly method to achieve the desired safety outcome.

## Education

The CFFO also emphasizes the importance of long-term thinking on important issues such as this. Education is a key piece that will be required for the long-term success of this sector. This includes education for customers and education for workers and business operators.

The CFFO has already written in support of *Bill 216, Food Literacy for Students Act, 2020* and strongly supports the benefits of experiential food literacy education on the process of producing and preparing food from farm to fork for both animal and plant production. Understanding the role of small abattoirs and meat processors would necessarily be part of this local food education. This will educate children as eaters, cooks and customers for local food. This should also inspire future workers and new entrepreneurs who wish to take on jobs or operate businesses in this sector for their profession.

The CFFO also supports Meat and Poultry Ontario's Growth Strategy. Part of the strategy emphasizes improving further education opportunities for workers and operators in the meat processing sector, including efforts to build up the social value placed on butchering as an artisan skill.

## Summary

Provincially inspected meat processors are vital to the success of livestock farmers serving Ontario customers. These entrepreneurial businesses are generally family-run and provide an essential service: they are a vital link in the overall local food supply chain that brings locally raised meat to the plates of Ontarians.

In order to support their success, the province has the opportunity to mitigate risks to these businesses by establishing a pre-approval process for new operator licenses, a pre-approval process for plans for new builds and expansions, an ombudsman committee to allow appeals of inspection findings and a process of review when minor improvements over a set cost are required. Education also plays a key role by increasing the social value of the skills required for processing and preparing meat. The CFFO wants to see greater success in this sector, which will in turn offer greater opportunities for livestock farmers in all regions of the province.

Thank you for your consideration of our input.

Sincerely,



Ed Scharringa, President  
Christian Farmers Federation of Ontario