



LONG-TERM THINKING FOR TODAY'S ISSUES

February 11, 2020

Dr. Siddika Mithani
President, Canadian Food Inspection Agency
1400 Merivale Road
Ottawa, ON
K1A 0Y9

Re: CFIA Processing Plant Closures

Dear Dr. Mithani,

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.

The CFFO recognizes the importance of protecting public health by ensuring food safety. We are proud that in Canada, across all levels of the food system, we maintain high standards of food safety and animal treatment. The CFIA plays an important role in ensuring those high standards are maintained.

At the same time, our food system is highly interconnected. Problems in one business or part of the system have significant impacts on many others.

On behalf of our members, CFFO would like to raise with you our concerns regarding the impact of temporary and permanent meat processing closures due to suspension or cancelation of licenses.

In particular we are concerned about:

- 1) The impact of suspension and cancelation of licenses on local livestock farm businesses.
- 2) Animal welfare concerns – animal transport distances and waiting times.
- 3) Food waste.

We recommend:

- 1) Whenever possible, work cooperatively with processors to help them avoid risks to safety or animal welfare to prevent the need for suspension of licenses.
- 2) Following a license suspension, have a system in place to help quickly facilitate livestock producers to be able to temporarily access abattoir spaces at another facility.
- 3) Following a license cancellation, have a system in place to help quickly facilitate more permanent access to abattoir services at another facility.

Impacts of Processing Shutdowns

Our food is produced through an interconnected food system. Independent businesses work together over a wide and interdependent network. Each individual business must operate under different systems of regulation, in some cases under different jurisdictions, even across borders, to make our food system and agri-food economy successful. When one business fails to meet with those regulations, many other businesses will be negatively impacted.

Abattoirs are a vital and sensitive part of the overall food system. Livestock farmers absolutely depend on access to abattoirs for humane and safe slaughter of their animals.

We recognize the importance of CFIA inspections and the need for shutdowns to ensure proper safety and animal care protocols are being observed. However, shutdowns do not happen in a vacuum. Temporary or permanent closure of a processing facility immediately results in lack of access to valuable and often limited processing spaces for livestock farm businesses.

Depending on the circumstances, this may mean animals are forced to wait longer or will need to travel significant distances to other suitable facilities, which can have negative animal welfare implications.

In other instances, there may be significant food waste if farmers cannot access processing facilities when needed: animals that are otherwise suitable for use in the food system may have to be put down on the farm instead. A good example of this situation is spent laying hens. These are suitable as meat birds but if processing facilities are not available, they may need to be euthanized and then composted on the farm instead.

We ask that part of the process for suspension or cancellation of a license include a coordinated effort that immediately helps livestock farmers access processing space at another operational facility within reasonable distance. This will help ensure livestock farmers and animals themselves are not unfairly punished for the failures or mistakes of another business.

Summary

The CFFO requests that CFIA recognize the broader impacts, especially on livestock farm businesses, of processing plant license suspensions and cancellations. We are asking that CFIA look for ways, in cooperation with other relevant businesses and organizations, to help quickly facilitate livestock producers' ability to access abattoir spaces at another facility in the event of a temporary or permanent closure.

Sincerely,



Clarence Nywening, President
Christian Farmers Federation of Ontario

CC: Hon. Patty Hajdu, MP, Minister of Health, Canada
Hon. Marie-Claude Bibeau, MP, Minister of Agriculture and Agri-Food, Canada