



Canadian Food
Inspection Agency

President

Ottawa, Ontario
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Agence canadienne
d'inspection des aliments

Président

Ottawa (Ontario)
K1A 0Y9

DEC 16 2016

Mr. Bill Casey, Member of Parliament
Chair of the House of Commons Standing Committee on Health
C/O David Gagnon, Clerk of the Committee
House of Commons
Ottawa, ON K1A 0A6

Dear Mr. Casey:

Thank you for your recent letter to me on behalf of the House of Commons Standing Committee on Health ("the Committee") with respect to testimony on behalf of the Canadian Food Inspection Agency (CFIA) before the Committee on June 8, 2016 regarding *Supplementary Estimates (A), 2016-17*.

In the November 24, 2016 letter, you requested clarification on a number of areas related to federal meat inspection. In the attached Annex, you will find a detailed response to the questions you posed.

This request underscores and reinforces the need to provide Canadians with clarity regarding the operations of the Agency and how decisions are taken within the food inspection system. As such, I am committed to improve communication and transparency to the Committee as well as to Canadians and stakeholders.

With respect to the concerns raised by the Agriculture Union, I have opened a dialogue with the Union regarding these issues and will continue to work with them.

Again, thank you for drawing the interests of the Committee to my attention. Please do not hesitate to contact me, should you require any further information in this regard.

Sincerely,

Paul Glover
President
Canadian Food Inspection Agency

Enclosure

Canada 

ANNEX

CLARIFICATION ON FEDERAL MEAT INSPECTION ACTIVITIES - THE CANADIAN FOOD INSPECTION AGENCY'S RESPONSE TO HOUSE OF COMMONS STANDING COMMITTEE ON HEALTH

The Committee requested that the Canadian Food Inspection Agency (CFIA) clarify if daily inspections for federal meat processing plants for domestic consumption have been reduced in Northern Alberta, and if so, how the Agency intends to resolve this situation, including expected timelines. The Committee also asked whether the Agency maintains different inspection standards for products exported to the US in comparison to products for domestic consumption and if so, why this is the case. Finally, the Committee asked if the Agency plans to undertake an audit of its resources to ensure it is able to comply with food safety requirements.

In order to effectively address the Committee's questions, we will first provide a brief overview of federal meat inspection, then address questions in a slightly different order that will provide a comprehensive understanding of the decision-making process that enables the Agency to manage its resources to address the complex dimensions of the meat inspection system.

An Overview of Canada's Meat Inspection System

There are two main aspects to the meat inspection system in Canada – slaughter inspection and meat processing inspection.

Slaughter inspections are undertaken at federally registered meat slaughter plants (operations that humanely kill and dress animal carcasses). Inspectors perform carcass by carcass inspections looking for signs of disease and food safety issues. They also deliver inspection tasks related to the effectiveness of operator control programs, plant sanitation and animal welfare. These requirements obligate the presence of CFIA inspectors at all times when a slaughter facility is operating.

Meat processing inspections are undertaken at federally registered meat processing facilities (operations that further process meat that was previously subjected to CFIA inspection at slaughter meeting federal requirements – may be of domestic or imported origin). The program direction for meat processing inspection is different than for slaughter inspection recognizing that the product being processed has already been inspected as it originates from slaughter facilities which have continual inspector presence. Therefore, a processing-only facility can operate without continuous inspector presence. Inspectors deliver compliance verification tasks that verify the effectiveness of the operator control program, such as cooking, cooling, good manufacturing practices and sanitation. These tasks do not require the continuous presence of an inspector, but instead are delivered by a CFIA inspector, at random times during the plant's operation.

The CFIA's national program direction for meat processing facilities requires that defined inspection tasks are conducted during each 12-hour shift of operation on a daily basis. The direction establishes the daily shift presence requirement for all plants, both those serving the domestic market and those processing products for export, including US eligible plants.

The CFIA requires that all domestic and imported foods meet the same stringent food safety standards.

Meeting Trade Requirements

Canadian meat products are able to be exported primarily on the basis of the strength of Canada's oversight system. Specifically for meat, importing countries typically require equivalence with their regulatory requirements and food safety objectives.

Canada's trading partners may impose additional requirements that may vary by commodity. However, these additional requirements, while important for ensuring access to foreign markets, do not necessarily improve food safety. The CFIA includes verification of additional importing country requirements in its national program direction in order to facilitate market access.

Does the Agency maintain different inspection standards for products exported to the US in comparison to products for domestic consumption?

The CFIA applies consistent meat inspection standards for products exported to the US and for domestic consumption.

The Committee heard testimony that CFIA inspectors are present at all times of operation every day and during every shift in federally registered meat slaughter plants. The testimony further noted that CFIA inspectors visit federally registered meat processing plants on a daily basis for each shift of operation, but are not present 100% of the time. Both of these elements of testimony accurately describe the CFIA program direction for federal meat inspection.

As noted, daily shift inspection presence (i.e., the presence of an inspector during every shift of operation) is a requirement in all federally registered meat establishments, whether they produce for export to the United States or for domestic consumption. For meat processing facilities, the national program direction is that an inspector is present, on a random basis, for the time required to conduct the specified inspection task during each shift (i.e. 12 hours of production time).

For simplicity of operations and to maintain consistent standards, the national program direction reflects the same practice for all federally registered meat processing plants, including those that do not export to the U.S.

CFIA inspectors base their work on risk. Regardless of how often they visit a plant, they spend more time conducting inspection tasks that:

- Deal with high risk products associated with food-borne illnesses;
- Have had compliance issues due to the presence of food borne pathogens or allergens; and
- Have had unsatisfactory in-depth inspections.

The CFIA uses the Compliance Verification System (CVS) to ensure that the meat industry is complying with Canada's food safety requirements. CVS sets out the both the inspection tasks and the frequency by which the task must be completed by CFIA inspectors for each type of meat facility. The CFIA undertakes an annual Compliance Verification System (CVS) task review, which provides a systematic method of prioritizing inspection tasks based on inherent risks in the meat program. It uses inspection data to manage risk, and it improves effectiveness of inspection by allocating appropriate resources to risk factors that may cause food-borne disease. The most recent review, released in April 2016, identified the need for both increases and decreases in task frequencies. Where the task frequency has decreased, the change has been supported by strong industry compliance levels. For example, inspection frequencies relating to allergen controls were increased, while the inspection of control plans for the storage of food, packaging material and non-food chemicals for some types of establishments decreased. The task frequency for sanitation and the inspection of surfaces that come into contact with food were not changed due to the importance and impact of this activity which was taken into account when the assessing the need to adjust the frequency of delivery.

It is the effectiveness of the conduct of the tasks which is of greatest relevance to food safety. While any organization strives for 100% delivery of its program direction, the CFIA requires, in recognition that adjustments are occasionally necessary, that should its delivery rate be less than 95%, an action plan be submitted by the relevant CFIA Region.

Does the Agency plan to undertake an audit of its resources to ensure it is able to comply with food safety requirements?

The Agency understands the importance of continual assessment of its operations, policies and related resources. That is why the CFIA routinely assesses the resources required to deliver on its mandate and the effectiveness of its performance; the CFIA is committed to regular audits of the resources supporting its food safety mandate as required by the *Safe Food for Canadians Act*.

In July 2009, the Report of the Independent Investigator into the 2008 *Listeriosis* Outbreak (the Weatherill Report) was submitted to the Government and publicly released. In 2010, the Government issued its final report on actions it had taken to respond to the Weatherill Report recommendations to strengthen the food safety system. The Weatherill Report included a recommendation that the CFIA retain third-party experts to conduct a resource audit in relation to the demand on its meat inspection resources. In response to this recommendation, the government conducted

a comprehensive review of meat inspection tasks and resources to deliver them, including an independent third-party review by Price Waterhouse Coopers. This independent review confirmed that the CFIA had appropriately determined the resources required to deliver meat inspection tasks. The government's final report concluded that federal funding received in 2009 and 2010 provided the inspection resources required to deliver meat inspection compliance verification tasks.

Given the value of these types of reviews, the Agency successfully proposed the inclusion of a provision for a five-year cyclical resource review under the *Safe Food for Canadians Act*.

Furthermore, recognizing that the resource review undertaken in response to the Weatherill Report is now over five years old, the Agency takes advantage of several sources of information to ensure the continued effectiveness of its program delivery with the resources allocated to it by Parliament.

The CFIA reports on its performance through the Departmental Performance Report. These reports reflect that the CFIA consistently achieves a high level of performance, which while its targets are not met in all cases 100% of the time, it operates at or close to target a significant majority of the time. The nature of CFIA's operations is impacted by fluctuations in demand for service, response to emergent events and occasional challenges in filling vacancies promptly. In addition the CFIA operates on a fixed capacity basis, delivering on its mandate with the resources appropriated by Parliament. Within this context the Agency is committed to a risk-based approach to directing its resources to respond to its mandate to protect the health and safety of Canadians and Canada's plant and animal resources. The Agency plans its activities and allocates its resources based on known, ongoing needs related to its mandate of protecting food safety, plant and animal health. But it must also remain agile in responding to emerging risks. In practical terms, that means that plans will change when faced with the reality of animal diseases such as BSE or avian influenza, foodborne illness outbreaks or even employee absences.

The CFIA conducts regular internal audits and evaluations of all its programs, including food. An evaluation of the CFIA's Meat Program was conducted in 2014, covering the period of 2009 to 2014. In addition, regular audits are conducted by trading partners to enable continued market access for Canadian meat products. Canada enjoys access to a large number of international markets and successive audits continue to confirm that Canada's meat inspection system meets, and exceeds, international standards and the requirements of trading partners. For example, 21 audits over the last 5 years have been conducted, including audits by the US (2), China (4), Japan (3) and the European Union (1).

The Agency created an Inspector General Office (IGO) which oversees the internal quality system for inspection by verifying a sample of federally regulated facilities on an unannounced basis and reporting on findings and performing trend analysis to identify potential improvement opportunities. This office conducted a total of 33 verifications between April 1 and June 30, 2016 in six food commodities. Eight of

those verifications were conducted in the meat sector, one of which was delivered in Northern Alberta Region.

As well, the World Organisation for Animal Health (OIE) will be conducting an evaluation of Canada's performance of veterinary services, including CFIA veterinary staff capacity and ability to manage animal health and zoosanitary standards, including veterinary activities in meat inspection. This third-party evaluation will provide strategic information to baseline Canada's veterinary infrastructure in order to maintain and expand access to foreign markets and protection of animal health.

Looking forward, the Agency has an ambitious modernization agenda that aims to improve the efficiency, effectiveness and transparency of Agency operations. The CFIA is committed to routinely assessing and making public changes in program design, delivery and resource utilization as the Agency modernizes.

Were daily inspections for federal meat processing plants for domestic consumption reduced in Northern Alberta?

Nationally, as reflected above, adjustments are sometimes necessary to respond to specific circumstances. In the case of meat processing facilities across Canada, the number of employees and the types of tasks that are done will vary based on available resources, risks assessed, trade requirements and staff vacancies.

In Northern Alberta the number of CFIA full time equivalents (FTEs) in processing plants fell from 15 FTEs to 12.5 FTEs over the January 2015 to October 2016 period.

During this period, it is recognized that inspection staff were stretched to continue to meet requirements. As a result, for a time-limited period, a regional action plan was required to be implemented which included reduced inspection task delivery for daily shift inspection presence with full consideration of the risk-based principles noted above. Thanks to the professionalism and extra-effort of CFIA inspection staff, the integrity of the food safety system was maintained during this time. The number of FTEs currently again stands at 15.0 and the national program standard continues to be met.