

January 10, 2019

Andrea Smallwood  
Policy Advisor, Legislative Policy Unit  
Food Safety and Environmental Policy Branch  
1 Stone Road West, 2<sup>nd</sup> Floor  
Guelph, ON  
N1G 4Y2

Dear Ms. Smallwood:

**RE: Proposed Amendments to the Meat Regulation (O. Reg. 31/05) under the *Food Safety and Quality Act, 2001***

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 family farm businesses across Ontario. These farm businesses form the backbone of our robust food system, and rural communities, with the potential to drive the Ontario economy forward.

OFA appreciates the opportunity to comment on the proposed amendments to the Meat Regulation (O. Reg. 31/05) under the *Food Safety and Quality Act, 2001*. Ontario's meat processing sector provides a critical link between Ontario livestock producers and consumers, while ensuring safe, high-quality food. Reducing regulatory burden and red tape for Ontario's producers remain priorities of OFA, ensuring Ontario agriculture remains competitive in an evolving, competitive environment. OFA supports the proposed changes, but we believe additional amendments and information are needed to further reduce regulatory burden and red tape and increase business opportunities for provincially-licensed meat processors. We are pleased to provide the following comments on the proposed amendments to the Meat Regulation.

**Reducing Administrative Burden**

*One-Time Licensing*

OFA is in favour of removing the requirement for provincially-licensed meat plants to renew their license every three years, and instead, require a one-time administrative fee of \$300. Updating only due to significant changes to the facility or business would help reduce paperwork and fees for operators. To further reduce regulatory burden and potential costs, OFA recommends the regulation clarify the term "significant" in respect to the required 30-day notice of proposed alterations to a director, as outlined in section 12 (2), subsections (b) and (c). Knowing when 30-days notification to a director is required would allow plant operators to better respond to issues relating to facility/property maintenance in a prompt manner, while potentially providing increased business opportunities when changing or introducing new licensed activities.

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*Voluntary Surrender of a License*

OFA supports the amendments to allow the voluntary surrender of an operator's meat plant license once no longer engaged in licensed activities.

**Clarifying Requirements to Provide More Business Opportunities**

*Update Processing Requirements for On-Farm Slaughter Carcasses*

OFA supports the amendments proposing to expand the times of year and the number of weeks on-farm slaughtered carcasses would be accepted in meat plants. Currently, on-farm slaughter applies only to cattle under 30 months of age, and swine. We recommend that other species such as lamb and goat be included.

*Clarify Options for Slaughter on the Farmer's Premises*

OFA supports the amendments to permit on-farm slaughter to be performed by someone other than the owner of the animal, given the person performing the slaughter is qualified. While the regulations require the person in a meat plant performing the slaughter to be trained in humane handling and slaughter techniques, more information is needed on how this proficiency would have to be demonstrated, if at all, on farm.

*Streamline Emergency Slaughter Procedures*

OFA is in favour of the amendment to streamline the emergency slaughter procedures to allow an appointed non-veterinary inspector to perform post mortem inspection at the slaughter plant.

*Clarify Hunted Game Provisions*

OFA is in favour of the amendment to permit hunted game products and carcasses at provincially-licensed meat plants for further processing.

*Update Certain Exemptions for Consideration of Religious Practices*

OFA supports the amendments to allow for the distribution of carcasses to those other than direct consumers. However, more details are needed as to additional controls which would be required to mitigate potential risks of further distribution, and food safety.

**Moving to More Outcome Based Requirements**

*Remove the Requirements for a Water Sampling Tap and Backflow Prevention Device*

OFA is in favour of the amendments to remove the requirement for both a dedicated water sampling tap and a backflow device, which, in addition to being more outcome-based, would also aid in decreased costs in construction and renovation of meat plants.

OFA takes this opportunity to recommend the definition of "related person" in section 10 (4) be expanded to include extended family members, as well as "step" family members, to further reduce red tape and reduce expenses incurred to change ownership during succession planning.

On behalf of our more than 38,000 farm family businesses across Ontario, OFA appreciates the opportunity to comment on the proposed amendments to the Meat Regulation (O. Reg. 31/05) under the *Food Safety and Quality Act, 2001*.

Sincerely,



Keith Currie  
President

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cc: Hon. Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs  
Beef Farmers of Ontario  
Ontario Independent Meat Processors  
Ontario Pork  
Ontario Sheep Farmers  
OFA Board of Directors