



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS



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Agenda Item 4.1 b)

GF/CRD Canada-2

ORIGINAL LANGUAGE

FAO/WHO GLOBAL FORUM OF FOOD SAFETY REGULATORS

Marrakesh, Morocco, 28 – 30 January 2002

COUNTRY PAPER PROPOSED BY CANADA

SUMMARY

A Canadian Perspective on the Implications

National and international awareness of the importance of food safety is increasing as a result of the identification of emerging foodborne pathogens and new hazards from imported and domestically produced foods. New approaches for regulatory inspection and enforcement activities and new technologies are being implemented as part of Canada's integrated approach to enhancing food safety.

In Canada, change is being driven by industry-wide adoption of Hazard Analysis Critical Control Point (HACCP) based practices. From a regulatory perspective, HACCP based risk management approaches are providing a basis for the strategic investment of inspection resources to maximize the effectiveness of inspection activities based on a better understanding of food safety risks and the management of those risks by industry.

Canada has made considerable progress and the implementation of HACCP programs such as the Quality Management Program, Food Safety Enhancement Program and Meat Inspection Reform have resulted in important lessons learned. Key lessons include: successful implementation of HACCP based inspection programs involves the commitment of regulatory resources from initial program design and consultation through to ongoing program maintenance; stakeholder *ownership* is essential to the success of HACCP programs; the introduction of HACCP programs requires careful planning with implementation staged over a reasonable transition period; and the implementation of HACCP programs have significant impacts on regulatory strategies, inspection activities and staff resulting from the change from *hands-on* inspection responsibilities to verification activities.

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Introduction

Inspection activities are changing. New approaches for regulatory inspection and new technologies are being implemented as part of Canada's integrated approach to enhancing food safety. Hazard Analysis Critical Control Point (HACCP) based risk management approaches provide a basis for the strategic investment of inspection resources to maximize the effectiveness of inspection activities based on a better understanding of food safety risks and the management of those risks by industry. On-line inspection based on sight, smell and touch for meat and poultry is no longer sufficient and it is recognized that controls need to be enhanced in order to better address invisible biological and chemical hazards.

Implementing Change

Canada's food, plant and animal health inspection systems are internationally respected and are among the best in the world. The safety of the food that we eat and the protection of plant and animal health requires constant vigilance to keep pace with rapid changes in the production and processing of food, increasing trade globalization, public expectations and demands for non-traditional foods.

Internationally, Canada is an active participant in the work of international standard setting bodies such as the Codex Alimentarius Commission, International Plant Protection Convention (IPPC) and Office International des Épizooties (OIE) to elaborate standards for protecting public health and safety, and animal and plant resource bases. Canada is also committed to the WTO Sanitary and Phytosanitary (SPS) Agreement and the Technical Barriers to Trade (TBT) Agreement which set out the rights and obligations directed at the movement of safe, quality products into and out of Canada.

Canada's integrated approach to food safety cuts across the food continuum with participants from governments at the federal, provincial/territorial and municipal levels, from industry in terms of producers, processors, distributors and retailers and from consumers. The approach is based on three fundamental principles:

- ◆ the health of the population is paramount;
- ◆ policy decisions must be grounded on science; and
- ◆ all sectors/jurisdictions must collaborate to protect consumers.

In Canada, change is being driven by industry-wide adoption of HACCP based practices and by regulators adoption of these same principles at the federal, provincial/territorial and municipal levels as a core element in inspection program design and intervention strategies. HACCP provides a structured, systematic framework for the identification of foodborne hazards and their control. The Canadian Food Inspection Agency (CFIA) has made considerable progress in the implementation of HACCP programs for example:

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- Quality Management Program (QMP)**
- ◆ The QMP was established as a mandatory program in 1992; the QMP requires all federally registered fish processing plants in Canada to develop and implement an in-plant quality control program using HACCP principles.
 - ◆ QMP also deals with non-safety issues, including fish quality and federal regulatory requirements such as labelling.
 - ◆ In 1998, the QMP was re-engineered to be fully consistent with application of HACCP as per *Codex Alimentarius* guidelines; QMP regulations were amended in 1999.
 - ◆ QMP has evolved over time; this step-wise approach responded to industry needs and to consumer requirements for a high level of assurance that fish and seafood products produced in Canada are safe and wholesome to eat.
- Food Safety Enhancement (FSEP)**
- ◆ FSEP is a HACCP program which targets processed agri-food products and shell eggs to ensure the conditions under which they are manufactured lead to the production of safe food.
 - ◆ FSEP encourages voluntary adoption of HACCP by federally registered establishments.
- Meat Inspection Reform**
- ◆ Canada has developed a strategy to guide the reform of the federal meat inspection program.
 - ◆ The objectives are to enhance the safety of meat and meat products, to increase the effectiveness of the inspection program and to facilitate the allocation of resources on the basis of risk.
 - ◆ A key element of the strategy is the establishment of HACCP as the standard for management of food safety risks by industry. Regulatory amendments are being developed to make HACCP mandatory in all federally registered meat establishments and to set performance criteria for the control of hazards and defects.
 - ◆ The process leading to mandatory HACCP has included a readiness survey of all registered meat establishments, national association meetings, industry information days across Canada, visits to smaller unrepresented establishments, consultations with all stakeholders and briefing CFIA staff.

- ◆ In addition, the CFIA has developed a HACCP based inspection program for poultry slaughter and will soon be piloting a similar approach for hog slaughter. Under HACCP based inspection programs, establishments are responsible for defect detection, subject to microbiological and defect detection performance criteria. Industry performance is continuously monitored on site by CFIA inspection staff. Development of HACCP based inspection programs for other species will follow.

To complement HACCP based inspection programs, the CFIA has made significant investments in information management systems and laboratories/testing methods to better support staff in the field.

Implications and Lessons Learned

The implementation of HACCP based regulatory programs, appropriate information management tools and laboratory support have significant implications for inspection program design and intervention strategies. The systematic targeting of areas at greatest risk has the potential to enhance food safety by increasing the effectiveness of inspection programs and by facilitating the strategic allocation of inspection resources to those areas where they will have the greatest effect.

Our experience suggests:

- ◆ *ownership* is essential to the success of HACCP programs industry leaders/early adopters can be important champions for the introduction of HACCP practices across an industry category;
- ◆ there is no one HACCP program that fits all regulatory requirements need to be clearly communicated to industry and regulators need to consult with and listen to feedback from all stakeholders as each HACCP application is unique industry needs to develop plant-specific HACCP systems that meet all regulatory requirements;
- ◆ the implementation of HACCP programs needs to be carefully considered, planned and introduced over a reasonable period step-wise approaches to the implementation of HACCP have provided time for industries/sectors to adjust and have contributed to greater ownership of the results;
- ◆ HACCP implementation involves resource commitments by industry and new skills and responsibilities for employees;
- ◆ the implementation of HACCP based inspection programs involves the commitment of regulatory resources from initial program design and consultation through to ongoing program maintenance;
- ◆ the benefits of HACCP are significant and may include:
 - increased industry knowledge of food safety controls, record keeping and corrective actions;
 - increased effectiveness of regulatory inspection systems;
 - more effective and efficient use of resources by both government and industry;
 - increased consistency/harmonization with the international marketplace; and
 - increased stakeholder confidence in the food safety system.

- ◆ from a regulatory organization perspective, the implementation of HACCP programs may have significant impacts on regulatory strategies, inspection activities and staff. For example, the shift from *hands-on* inspection responsibilities to verification activities requires appropriate training and certification for staff; and
- ◆ internal staff communication is critical to the success of introducing HACCP based inspection programs communicate early and often with staff and provide essential information on the status of HACCP implementation.