



Nov 7 2014

**Subject** –Canadian Produce Marketing Association comments to the **Food Program Framework Consultation**

**Comment Submitted to:** [CFIA-Modernisation-ACIA@inspection.gc.ca](mailto:CFIA-Modernisation-ACIA@inspection.gc.ca)

Based in Ottawa, Ontario, the Canadian Produce Marketing Association (CPMA) is a not-for-profit organization representing companies that are active in the marketing of fresh fruits and vegetables in Canada from the farm gate to the dinner plate. CPMA members cover various industries, integrating all segments of the fresh produce industry, including major growers, shippers, packers and marketers; importers and exporters; transportation and logistics, brokers, distributors and wholesalers; retailers, fresh cuts and foodservice distributors, operators and processors. CPMA is proud to represent over 785 domestic and international members who are responsible for 90% of the fresh fruit and vegetables sales in Canada.

CPMA appreciates the opportunity to provide the following comments on the CFIA Food Program Framework and is supportive of the changes enabled by the SFCA which will allow CFIA to apply consistent regulatory requirements and inspection approaches across all regulated food commodities.

- **The preface** indicates that this framework will be reviewed and updated every five years (or sooner if necessary) in line with the legislated five year review of the SFCA. Prior to documented changes industry would welcome consultation to provide feedback on the updated framework prior to it being documented in the Document Control section.
- Given that additional requirements may be applied to specific commodities and requirements for the fresh fruit and vegetable industry will be tailored to address the need for controls that are specific to those commodities not captured in horizontal food safety requirements (**Sec 6.4**), one of the foundational elements of the program includes **competent and qualified staff** and CFIA's commitment to the professional development of its employees by supporting learning and development programs; CPMA requests that CFIA ensure that commodity specific expertise be included as one of the elements of its training and/or professional development programs.
- **Section 6.3 states** that "Interpretive guidance and model systems related to the food program will be available on the CFIA's website". Industry stakeholders should be included in the development of guidance documents
- **Section 6.3.1 states:** "Compliance promotion should be a collaborative effort in order to be successful. Industry, regulators, third parties and consumers all play a part in securing compliance", and "The main vehicle for compliance promotion products at the CFIA is the CFIA's website which holds information and links to various documents, references and guidance material. One of the most helpful products is the Guidance Document Repository. CFIA is overall, supportive of this approach however feels that the

“Centres of Expertise which will be established to provide a single point of interpretation and advice to inspectors” (6.3.1) should be made accessible to industry stakeholders, or at the very least industry associations who represent many stakeholders. In that way industry can proactively receive interpretation or additional guidance to facilitate compliance as well as interpretation of non-compliances.

- **Section 6.3.1 Complementary Voluntary programs** states “The Food Safety Recognition Program (FSRP) is one such voluntary program. It is led by the CFIA with the participation of the provincial and territorial governments and industry. The purpose of the program is to provide a framework to support industry-led food safety systems in order to maintain the confidence of FPT governments, Canadian consumers and Canada's trading partners. Once fully recognized, the industry-led scheme can be accepted as a model system and factored into CFIA risk oversight.”

CPMA would like to reiterate the comments we provided to the consultation on Private Certification that:

CPMA recommends that the CFIA commit to the continuation of the two national recognition programs for Canadian, industry-led food safety certification schemes.

As a developer of a HACCP-based food safety management system for the repacking and wholesale sector of the produce supply chain, (now a component of the CanadaGAP food safety certificate program), CPMA has long been a supporter of industry-led, HACCP or HACCP-based food safety management system certification schemes for the non-registered sector, including farms.

CPMA has supported, at the national and international level, the CFIA-led federal-provincial-territorial initiative to establish national programs to recognize these certification schemes.

As you know, the two national recognition programs (<http://inspection.gc.ca/food/safe-food-production-systems/food-safety-enhancement-program/recognition-program/eng/1299860970026/1299861042890>) were developed during an extensive round of negotiations, starting in 1998, between CFIA, the provinces and territories and representatives of industry associations from all along the supply chain. These recognition programs are built on a rigorous, step-wise process that assesses them for technical soundness and administrative effectiveness. The criteria for the recognition programs include the requirement that the certified farm or food business be in compliance with all pertinent regulatory requirements and be in conformity with the requirements established as a result of either the rigorous generic hazard analysis or site-specific hazard analysis. In addition, the farm or business must meet the scheme requirements concerning documentation, record-keeping, training, and certification.

- **Regarding Section 7.2.1 Consultation principles - Principle 3: Timing - organize consultation activities with appropriate timeframes and deadlines to allow participants reasonable time to prepare and provide their input.** CPMA would like to stress that it is important moving forward that adequate timeframes and deadlines are provided to stakeholders to prepare and provide input to all consultations. Many of the recent consultation timelines were very aggressive and with the many on-going consultations occurring at the same time, it created significant resource burden for many stakeholders wishing to give due diligence to the proposed regulations and provide thoughtful comments.