

Wednesday, September 30, 2020

The Honourable Patty Hajdu
Minister of Health

Dear Minister Hajdu,

We are writing today to express our deep concerns with the intended implementation on October 5th of CFIA's new temporary preventative control measures for romaine lettuce imported from the U.S. To be clear, the intended measures are preventative in nature and not in response to any current e. coli contamination. While we recognize and share your commitment to ensuring the safety of Canada's food supply, these measures were developed without consultation, are not achievable in the timeframe provided, and would result in significant impacts on Canadian industry and consumers.

Industry was informed on September 28 by CFIA of new requirements for romaine lettuce to take effect on October 5th – 7 days notice. At that time, we received a draft of the requirements (attached) which are slated to be finalized today, 5 days from the compliance date, while there is currently no active e. coli contamination identified with these products. The draft protocol is overly complex and confusing and will result in significant costs to industry and severe restriction on the choices available to Canadian consumers.

As you can imagine, with so little time to set up the processes required for the testing protocols, the significant additional cost in a time when industry is struggling with the many unforeseen COVID-related burdens, and with requirements that are beyond the scope of the scientifically-sound protocols already in place, industry compliance is impossible in 5 days. Implementation of the requirements risks significant disruptions, financial impacts, food waste and the high likelihood of no romaine available to Canadians at a time when the health of both Canadian citizens and industry could not be of more importance. In addition, this will have an extremely difficult impact on small and medium size retailers who are already struggling with supply issues.

Although CFIA have noted that there is no opportunity for consultation, **we request that this be reconsidered and the associations below be given at least a week to consult with members, provide feedback to CFIA to ensure a more efficacious implementation of preventative measures and be given four weeks to prepare for compliance.**

We look forward to a collaborative approach to ensuring the health of Canadians without inadvertently adding to the burdens already facing the food supply chain in Canada.

Sincerely,

Jason McLinton
V.P., Grocery Division and Regulatory Affairs
Retail Council of Canada

Lauren van den Berg
Executive V.P., Government Relations
Restaurants Canada

Jane Proctor
V.P. Government Relations
Canadian Produce Marketing Association

Gary Sands
Senior V.P. Government Relations
Canadian Federation of Independent Grocers

Rebecca Lee
Executive Director
Canadian Horticultural Council

Keith Mussar
Vice-President, Regulatory Affairs
I.E. Canada

Cc: The Honourable Minister Bibeau, Minister of Agriculture and Agri-Food
The Honourable Minister Ng, Minister of Small Business and Export Promotion
The Honourable Jean-Yves Duclos, President of the Treasury Board