



CANADIAN MEAT COUNCIL  
CONSEIL DES VIANDES DU CANADA

**By e-mail only:**  
***bcs-bipc@hc-sc.gc.ca***

September 06, 2016

Health Canada  
Bureau of Chemical Safety, Food Directorate  
251 Sir Frederick Banting Driveway  
Tunney's Pasture, PL: 2202C  
Ottawa, ON K1A 0L2

Dear Sir or Madam:

**Re: Health Canada's Proposal to Remove "Solid cut meat with or without added phosphate salts" From the List of Foods that are Permitted to Contain Transglutaminase in the List of *Permitted Food Enzymes***  
**Notice of Proposal – *List of Permitted Food Enzymes***  
**Reference Number: [NOP/AVP -0020]**

Please accept the comments of the Canadian Meat Council ("CMC") on the above referenced matter.

The Canadian Meat Council has been representing Canada's federally inspected meat processing industry since 1919. Recording annual sales of \$23.6 billion, exports of \$5.7 billion, and 65,000 jobs, the meat industry is the largest component of Canada's food processing sector.

Although CMC's meat processing members do not use transglutaminase as a food ingredient in "solid cut meat with or without added phosphate salts" in both domestic and export products, they question the scientific logic associated with this proposal. For example, when consulting Notice of Modification to the *List of Permitted Food Enzymes* to Enable the Use of Transglutaminase from *Streptovercillium mobaraense* s-8112 in Bread, Flour, Whole Wheat Flour and Unstandardized Bakery Products – Document Reference Number: NOM/ADM-0071 – transglutaminase is approved for use in a number of other food products such as unstandardized prepared fish products, simulated meat products, unstandardized cheese and processed cheese products, yogurt and unstandardized frozen dairy desserts. In this context, the logic for the removal of transglutaminase in "solid meat cuts with or without added phosphate salts" from the *List of Permitted Food Enzymes* is baffling.

In addition, the scientific and regulatory foundations of the proposal are weak. Our research has failed to unearth reported cases of microbial contamination in meat formed with the transglutaminase enzyme.

Moreover, if the concern of microbial cross contamination is due to the binding process from transglutaminase use in solid cut meat, other meat processing applications such as mechanically tenderized beef could potentially introduce similar microbial hazards. The only way to reduce microbiological cross-contamination during meat processing is by adopting food safety risk managements systems which meat processors already do through HACCP.

Finally, there are other food ingredients with similar binding functions as transglutaminase. To focus simply on transglutaminase is discriminatory and not justified if the presumed microbial safety risk is similar for other ingredients with similar applications. By Health Canada's own criterion, it would then be necessary to remove ingredients which have been widely accepted and used in the meat industry for many years such as alginates, fibrinogen or gelatin from the list. This proposal would have far reaching consequences within the meat industry and would negatively impact Canadian meat processors and ingredient suppliers by stemming the tide of innovation and competitiveness in this increasingly competitive global marketplace.

As a result, the Canadian Meat Council believes that Health Canada should avoid taking such a drastic measure by removing transglutaminase in "solid cut meats with or without added phosphate salts", especially when there are other regulatory and non-regulatory actions that it could take to mitigate microbial safety risk. Health Canada should amend its proposal to reflect and address the true issue which includes proper handling and processing of raw meat products and the requirement for cooking through solid cut meats that is formed with transglutaminase through enhanced labelling requirements and consumer education.

Sincerely,

A handwritten signature in black ink, appearing to read 'Suzanne Sabourin', is written over a light gray rectangular background.

Suzanne Sabourin  
Director, Legal and Regulatory Affairs