



By e-mail only:

LRM_MLR_consultations@hc-sc.gc.ca

August 24, 2016

Mr. Bruno Rodrigue
Office of Legislative and Regulatory Modernization
Policy, Planning and International Affairs Directorate
Health Canada
Address Locator: 3105A
Holland Cross, Tower B, 5th Floor
1600 Scott Street
Ottawa, ON K1A 0K9

Dear Mr. Rodrigue:

Re: Regulations Amending the Food and Drug Regulations (Food Irradiation)

On behalf of producers, processors and consumers who are interested in a safer food supply, the member companies of the Canadian Meat Council (“Council”) strongly support Health Canada for proposing that beef packers and processors be allowed to add irradiation to their list of measures to enhance the safety and security of fresh and frozen raw ground beef.

Irradiation offers a longstanding, well-researched, internationally accepted and proven methodology for further reducing the potential presence of harmful pathogens in meat. Indeed, a review of a Joint Food and Agriculture Organization/International Atomic Agency/World Health Organization Expert Committee on Food Irradiation on the safety of food

irradiation led to the adoption, in 1983, of a General Standard for Irradiated Foods by the Joint FAO/WHO Standards Programme, the *Codex Alimentarius* Commission.

Without a doubt, Health Canada's recognition of this scientifically validated technology for fresh and frozen raw ground beef will further contribute to: reduce human illness and suffering; decrease healthcare expenditures; improve confidence in Canada's food safety system; benefit Canadians economically; and, finally, provide Canadian consumers with the opportunity to exercise individual choice, a freedom which American consumers have long held, but one which was only available to Canadians when they were in a position to make their purchases of meat in the United States.

Health Canada has taken a significant step in enhancing the risk-responsiveness of Canada's food safety system by concluding that the irradiation of ground beef within the parameters of this regulatory proposal is safe, effective, and does not significantly impact the nutritional quality of the beef. In the future, Health Canada is encouraged to continue adding to the list of irradiated foods permitted for sale in Canada by giving prompt consideration to science-based proposals on irradiation as an effective food safety technology for other meat products such as beef trim as well as chicken meat and poultry.

Industry, public health associations and academia reaffirmed their support for the advancement of this regulatory proposal during a 2015 targeted stakeholder consultation. One year before, the results of the 2014 online survey, "Consumer Perceptions of Food, Wave 4" commissioned by Agriculture and Agri-Food Canada (AAFC) and conducted by Ipsos Reid, revealed a positive shift in public attitudes towards food irradiation. The Regulatory Impact Analysis Statement notes that: "[a]lthough the majority of respondents (72%) had not heard of food irradiation, overall perceptions were slightly more positive (30%) than negative (21%) when respondents were informed that irradiation is a food safety measure that reduces the levels of bacteria that cause food poisoning and spoilage".

Irradiated ground beef, like all irradiated foods, must be clearly labelled to allow consumers to exercise their individual choice. In the absence of clarifying statements on the safety of food irradiation to existing labelling and packaging requirements under section B. 01.035 of the *Food and Drug Regulations*, the Council believes that the results of the 2014 online consumer survey underscore the importance of a Health Canada consumer education campaign to enhance consumer understanding of food irradiation and increase acceptance of this food safety technology.

In closing, the Canadian Meat Council wishes to reiterate that it endorses Health Canada's regulatory proposal for optional irradiation of fresh and frozen raw ground beef in Canada. The Council also believes that Health Canada should consider supporting the proposed regulations by a non-regulatory instrument such as a consumer education campaign.

Sincerely,

A handwritten signature in black ink, appearing to read 'Suzanne Sabourin', enclosed in a thin black rectangular border.

Suzanne Sabourin
Director, Legal and Regulatory Affairs