



National Farmers Union
Union Nationale des Fermiers



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Richard Arsenault, Executive Director
Domestic Food Safety Systems and Meat Hygiene Directorate
Canadian Food Inspection Agency
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Dear Mr. Arsenault:

Re: Consultation on Safe Food for Canadians Act proposed regulations

The Safe Food for Canadians regulations, as they are currently proposed per notice in Canada Gazette, Part I, Vol. 151, No. 3 — January 21, 2017, greatly increases the regulatory burden through the requirement and cost of a Preventive Control Plan (PCP) for farmers selling direct-to-market (directly to consumers or end users such as restaurants) across provincial boundaries.

Due to the existing high degree of transparency, ease of traceability, and close relationships inherent in the direct-to-market model of farming, farmers in this sector are very aware of the business loss they would face in the disastrous event of a food safety situation. Therefore, they already prioritize food safety for their customers, with whom they interact face-to-face on a regular basis.

The direct-to-market model of food access and farm marketing is different from how much of Canadian food production and distribution is managed. The proposed *Safe Food for Canadians* regulations may streamline regulations for many agricultural sectors, but they create significant obstacles for direct-to-market farms.

We would like to recommend a change to the proposed *Safe Food for Canadians Act* regulations: **to exempt all direct-to-market interprovincial sales and let them continue to be regulated as per the legislation in the sold-in province.**

While an exemption is proposed for farms with gross sales of \$30,000 or less per year, this threshold has little to do with achieving food safety outcomes and arbitrarily affects farms regardless of other factors such as number of kilometres travelled, marketing type, product raised, physical size of farm, or number of employees.

To define a “small farm” is a very challenging task, as both gross farm sales and physical acreage of a “small” farm is greatly affected by the product(s) raised. What is clear is that once expenses are deducted, not many farmers could make a liveable income with annual gross product sales of less than \$30,000.

A goal of many farmers across Canada is to be able to move from being part-time farmers to making their full-time income from their farm.

For any farm that sells its produce directly to local consumers who just happen to be located across a provincial boundary, complying with the proposed regulations would add yearly expenses of approximately \$6,370, as is directly stated in the *Safe Foods for Canadians Act Regulations* regulatory analysis. This extra cost puts direct-to-market farmers whose local market crosses provincial borders at a

great competitive disadvantage in relation to similar farmers who don't need to cross a provincial border in order to pursue their livelihood.

In Canada, we have a rich diversity of communities, and not all of them fall neatly within provincial borders. Our nation's capital is a great example of this, with much of its fresh, local produce supplied from the Quebec side of the Ottawa River. Our smaller provinces located in Atlantic Canada are another great example of communities that straddle provincial barriers (each province has examples of these border communities). In fact, there are many examples of Canadians from all sectors of employment, not only farmers, who cross a provincial border in order to provide for their family's livelihood.

These proposed regulations, as they are, could very strongly and negatively impact the livelihoods of locally-based, direct-to-market farmers, potentially putting them out of business, in a time when our rural economies need more support than ever.

While we can all support the idea that safe food is a necessity for Canadians, equitable access to fresh local food should also be a top priority. Farmers who sell locally and directly to the public (rather than through wholesalers and distributors or major grocery store chains) are meeting a growing desire of Canadians who want to know where their food is coming from and to develop relationships and trust in the people who produce their food. Through direct sales, the public interacts with growers – a powerful way to build public trust in Canadian food and agriculture.

Please consider the negative impact these regulations would have on direct-to-market farms -- and in turn our rural economies -- and amend them to exempt all direct-to-market interprovincial sales and allow them continue being regulated as per the legislation in the sold-in province.

Respectfully submitted by,

The Direct Marketing Committee, National Farmers Union