



Government
of Canada

Canadian Food
Inspection Agency

Gouvernement
du Canada

Agence canadienne
d'inspection des aliments

April 25, 2001

COMMUNIQUÉ

Subject: PROPOSED AMENDMENT OF THE *FISH INSPECTION REGULATIONS* AND *MEAT INSPECTION REGULATIONS* ALLOWING EXEMPTIONS TO THE MANUFACTURE OF FOODS CONTAINING BOTH MEAT AND FISH PRODUCTS

Currently, companies wishing to prepare foods that contain a combination of both meat and fish products must be registered under both the *Fish Inspection Regulations* (FIR) and the *Meat Inspection Regulations* (MIR). For example, a company that is federally registered under the FIR that plans to manufacture a product that contains both meat and fish, would also require registration under the MIR, even if the meat component added to the product received no processing other than the final assembly of the product. A large proportion of these foods are identified and purchased by consumers either more for their fish component or for their meat product component.

The purpose of this communiqué is to provide notification of the Canadian Food Inspection Agency's (CFIA) proposal to amend the MIR to exempt foods that contain both meat and fish that are commonly recognized as fish products; and to amend the FIR to exempt foods that contain both meat and fish that are commonly recognized as meat products.

The following criteria would need to be met:

- the food must be recognized primarily as either a meat product or as a fish product having regard to the nature of the food and the relative proportion of meat and fish therein;
- both the fish and the meat components utilized in the preparation of the final product must originate from an establishment registered in accordance with the appropriate Canadian legislation or have been imported in compliance with the appropriate Canadian legislation;
- the registered processor manufacturing the final product could only carry out minimum processing specific to assembling and trimming of the component not covered under their relative legislation (e.g. an establishment registered under the FIR would not be allowed to perform any processing of the meat component of the final product other than trimming and assembly.)

These requirements would apply equally to both domestic and imported products.

Further information on this initiative is available in the attached discussion paper.

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We are requesting suggestions for food products that contain both meat and fish ingredients to develop a list of exempted products and acceptable minimal processing activities. Please forward any product suggestions and/or any comments concerning this proposed amendment to the FIR and MIR to either of the undersigned before May 18, 2001.

Original signed by

Ross Thompson

(for)

Cameron Prince
Director
Fish, Seafood and Production Division

Original signed by

Dr. Merv Baker
Director
Food of Animal Origin Division



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Food Containing Both Fish & Meat Product Ingredients

Proposed Regulatory Amendment to

**The Meat Inspection Regulations
and
The Fish Inspection Regulations**

**Discussion Paper
March 30, 2001**



Introduction

Both the *Meat Inspection Act* and the *Fish Inspection Act* enable the Government of Canada to regulate the safety and quality of meat and fish products imported into Canada or produced in federally registered establishments for export or interprovincial trade. Pursuant to these Acts, the *Meat Inspection Regulations, 1990* (MIR) and the *Fish Inspection Regulations* (FIR) specify the conditions for licensing operators of federally registered establishments.

The current structure of the legislation requires companies that prepare foods containing both meat and fish product ingredients (i.e. multi-commodity products) to be registered under both the MIR and the FIR. This requirement applies even if the ingredients used in the manufacture of the food had originated from a Canadian federally registered establishment, and the manufacture of the multi-commodity product requires an insignificant amount of processing of the ingredient. For example, an establishment federally registered to process scallops that is planning to expand their product line to include bacon wrapped scallops, would require additional registration to process meat products, even if the bacon was already prepared by a federally registered meat processor. Likewise, an establishment federally registered to process beef that wishes to expand their product line to include beefsteak stuffed with shrimp, would require additional registration to process fish, even if the shrimp was already processed by a federally registered fish plant.

In the above examples, the degree of processing on either the meat or fish ingredients would be insignificant, and would be limited to processes such as trimming, weighing portions and assembly. The legislative requirements for the original production of the meat or fish ingredients used for multi-commodity products (i.e. the application of the MIR for the bacon and the FIR for the shrimp) is sufficient to protect public health and safety. The requirement to have an establishment meet the additional legislative requirements of the other regulations when that establishment: a) is already registered under either the FIR or MIR; and b) wishes to prepare a multi-commodity product; offers no additional protection to the public. This requirement does result in increased costs to Canadian fish and meat processors wishing to expand their product lines to include multi-commodity products. These increased costs limit Canadian processors' abilities to respond to consumer demands for greater product variety and convenience.

A number of foods prepared in Canada or imported into the country contain both meat and fish products. A large proportion of these foods are identified and purchased by consumers either more for their fish component or for their meat product component. The Canadian Food Inspection Agency (CFIA) is committed to effectively deal with foods that contain both a meat and a fish component in order to avoid processing plants from being registered under both the *Fish Inspection Regulations* and the *Meat Inspection Regulations*, and thus reduce the cost to the Canadian industry of producing those products.



During a preliminary review of the situation, the following options were presented for further investigation:

- Maintain current requirement that processors handling meat and seafood mixtures must be registered in accordance with both the FIR and the MIR (Status Quo).
- Amend the *Meat Inspection Regulations* (MIR) to exempt foods that are commonly recognized as fish products and amend the *Fish Inspection Regulations* (FIR) to exempt foods that are commonly recognized as meat products. Meat ingredients used in exempted fish products could only receive minimal processing in the fish plant and vice versa.
- Amend both the *Fish Inspection Regulations* and the *Meat Inspection Regulations* to exempt meat and fish mixtures based on the percentage of meat/fish in the product. Meat ingredients used in exempted fish products could only receive minimal processing in the fish plant and vice versa.

Options

Option 1 STATUS QUO

Maintain current requirement that processors handling meat and seafood mixtures must be registered in accordance with both the FIR and the MIR.

Pros	Cons
Certification of product can be supported by both MIR and FIR	Industry faces additional costs. May result in conditions favoring imported products over domestic products. CFIA not seen to be responsive to its mandate “to enhance the effectiveness and efficiency of federal inspection and related services for food”. Offers no further reinforcement of product safety and consumer protection



Option 2

Amend the *Meat Inspection Regulations* (MIR) to exempt foods that are commonly recognized as fish product. Amend the *Fish Inspection Regulations* (FIR) to exempt foods that are commonly recognized as meat products.

Amend the MIR to exempt fish and meat mixtures that are commonly recognized as fish products from the application of the *Meat Inspection Regulations*.

The following criteria would need to be met:

- the food must be recognized primarily as a fish product and the food shall be included in a list found in the Meat Hygiene Manual of Procedures;
- the meat component utilized in the preparation of the fish product must originate from an establishment registered in accordance with the MIR or a foreign establishment authorized to export meat products to Canada;
- the fish product containing the meat component must be manufactured in an establishment registered in accordance with the FIR or its foreign equivalent; and
- the registered fish processor could only carry out minimum processing to the meat ingredients specific to trimming and/or assembly.

Amend the FIR to exempt meat and fish mixtures that are commonly recognized as meat products from the application of the FIR. Similar criteria would need to be met:

- the food must be recognized primarily as a meat product and the food shall be included in a list found in the Fish Products Inspection Manual;
- the fish component utilized in the preparation of the meat product must originate from an establishment registered in accordance with the FIR or imported into Canada in compliance with the FIR;
- the meat product containing the fish component must be manufactured in an establishment registered in accordance with the MIR or its foreign equivalent; and
- the registered meat processor could only carry out minimum processing to the fish ingredients specific to trimming and/or assembly.

The requirements would apply equally to both domestic and imported products.

Exemption from the MIR would be granted only when processing is limited to trimming and/or assembly of the meat component of the final product by the federally registered fish processing establishment. Exemption from the FIR would be granted only when processing is limited to trimming and/or assembly of the fish component of the final product by the federally registered meat processing establishment. The intent is to allow the use of a meat product as an ingredient in the preparation of a fish product, not to allow the preparation of a meat product in a federally registered fish processing establishment that is not also registered under the MIR, and vice versa. For example: the trimming and assembling of smoked bacon around scallops would be allowed in a fish plant, but not the curing and smoking of the bacon.



A list of exempted products and acceptable minimal processing activities would be developed (input from the industry is requested). The plan is to include this list in both the fish and meat hygiene policy manuals.

Pros	Cons
<p>Product safety and consumer protection are maintained</p> <p>Industry will not face additional costs to produce product recognized as a fish or meat product.</p> <p>CFIA is responding to its mandate “to enhance the effectiveness and efficiency of federal inspection and related services for food”.</p>	<p>Product certification represents a challenge.</p>

Option 3

Amend both the *Fish Inspection Regulations* and the *Meat Inspection Regulations* to exempt meat and fish mixtures based on the percentage of meat/fish in the product.

Products would be exempted based on a preset percentage, such as 45%. Fish products with less than 45% meat to be exempt from the MIR. Likewise, meat products with less than 45% fish would be exempt from the FIR.

The meat component in the multi-commodity product must originate from an establishment registered in accordance with the MIR or a foreign establishment authorized to export meat products to Canada. Similarly, the fish component in the multi-commodity product must originate from an establishment registered in accordance with the FIR or have been legally imported into Canada.

The requirements would be applied equally to both domestic and imported products.

Exemption from the MIR would be granted only when processing is limited to trimming and/or assembly of the meat component of the final product by the federally registered fish processing establishment. Exemption from the FIR would be granted only when processing is limited to trimming and/or assembly of the fish component of the final product by the federally registered meat processing establishment. The intent is to allow the use of a meat product as an ingredient in the preparation of a fish product, not to allow the preparation of a meat product in a federally registered fish processing establishment that is not also registered under the MIR, and vice versa. For example: the trimming and assembling of smoked bacon around scallops would be allowed in a fish plant, but not the curing and smoking of the bacon.



Pros	Cons
Same as option 2	Same as option 2 Actual percentage of meat/fish in product may vary as a result of variations in raw materials. Additional compliance actions will be needed.

Recommendation - Option 2

During the preliminary review of the current situation, the preferred option requires regulatory amendment to both the MIR and FIR providing for exemptions for additional registration based on how the multi-commodity products would be recognized. This option would allow the CFIA to establish a list of multi-commodity products that would be inspected primarily as a meat product or as a fish product.

The CFIA will review many factors to decide if a food should be considered either as fish product or a meat product for exemption from either the MIR or the FIR. These factors include:

- general acceptance of the food as either a fish or a meat product as established by tradition or by taking into account the results of consultations with stakeholders (e.g. the meat and the fish processing industry and consumers associations and consumers);
- the quantity of the fish and meat product ingredients in the food and their relative proportions with respect to the total weight of the food.

Canadian establishments processing multi-commodity products for the domestic market would be covered by a single inspection program. The characteristics of the product would determine if it would be recognized as either a meat product or as a fish product.

Imported products would also be covered under a single inspection program based on their recognition as either a meat or fish product. To maintain equivalence with the requirement for domestic multi-commodity products, both components of imported multi-commodity products would be required to originate from sources in compliance with both the MIR and FIR. Animal health requirements would continue to apply to imported multi-commodity products.

Exports from Canada are subject to foreign country requirements. These vary from one country to the next. Certification of multi-commodity products may present a challenge as they will be affected by foreign country import controls.