

Submitted by email to Canada-European Union CETA Regulatory Cooperation Forum c/o:

Brennen Young
Director
Regulatory Cooperation
Regulatory Affairs Sector
Treasury Board of Canada Secretariat

Dear Mr. Young,

The Canadian Meat Council (CMC) welcomes the opportunity to provide comment on areas for regulatory cooperation between Canada and the European Union (EU) to the Treasury Board of Canada. The Canada-EU Comprehensive Economic and Trade Agreement (CETA) is a great opportunity for Canadian meat processors to increase their exports of high-quality product.

Although there is increased access through CETA, there are several regulatory areas that continue to act as barriers in order to take full advantage of this new trade opportunity. The key areas outlined below are those on which the CETA regulatory cooperation forum could work to alleviate regulatory roadblocks and increase the growth of exports to the EU.

1. The administration of quota needs to be streamlined. This is currently a barrier that complicates the flexibility of Canadian exporters and, does not come close to the simplicity for EU exporters to Canada. It is suggested that until fully subscribed, importers should be able to apply for import quota for immediate use instead of applying 30 days in advance of the following quarter.
2. Work should be done to align or recognize approval processes for processing aids between Canada and the EU. Unlike most other jurisdictions, Canada does not have a regulatory definition of processing aid. Health Canada, therefore, regulates certain interventions as food additives, which may not be considered as such by the EU. Alignment of the acceptance of processing aids would reduce inconsistency and allow the expedient use of approved substances in products traded between the two partners.
3. A joint or cooperative food safety risk assessment process between Canada and the EU will build relationships but also facilitate risk-based decisions on food safety issues and other risks, such as animal health and emerging hazards.
4. Work should continue to align Canada's electronic export certificate model and gain acceptance of the EU to continue to make trade easier and more efficient.



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5. This forum should focus on expediting ongoing work to ensure EU Trichinella requirements are not a major barrier for pork export. The Canadian pork industry has been working to build a component in Canada with a negligible risk of Trichinella contamination under OIE/Codex standards with the aim to be recognized by EU as an equivalent for the EU requirements on Trichinella.
6. The differences between cooling temperatures in meat processing establishments between Canada and the EU appear to be overlooked upon import of EU product. The lower temperatures required in Canadian establishments impact yields, operating costs and employee welfare. EU pork and beef enter the Canadian market despite being produced under less safe, less onerous conditions. Alignment should be considered for food safety, but also to ensure a level playing field.
7. The requirements between the two countries for using vet drugs in livestock are not currently aligned. The EU insists that Canada not use certain vet drugs in livestock whose meat is exported to the EU, whereas the EU is allowed to export veal to Canada including the use of several medications prohibited for veal production in Canada. CFIA permits imports from the EU with only monitoring tests on muscle meat, while the EU insists that unauthorized vet drugs never be used by Canadian producers.
8. The EU also continues to ban the use of hormones and beta agonists in livestock production in violation of international scientific agreements and WTO obligations.

The points listed above are key areas described at a high-level, where Canadian meat processors feel that regulatory cooperation should occur to facilitate access to this new market.

Thank you for the opportunity to provide comment on the work of the CETA Regulatory Cooperation Forum. If you require further details, CMC welcomes the opportunity to discuss these areas more specifically, and work together on mitigating these factors and finding solutions.

We are optimistic that this work will lead to increasing opportunities for trade and fully utilizing the newly gained access while reducing regulatory inconsistencies.

Kind Regards,

Chris Nash
Director of Regulatory Affairs
Canadian Meat Council