

Western Stock Growers' Association

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Hon. Gerry Ritz:

RE: Producers Require Accountability

As the XL plant works toward getting up to speed and the acute part of the packing crisis comes to pass, the Western Stock Growers' Association (WSGA) would like to explore the future of the beef industry. In order for us to envision the future we must know exactly what happened in the past. It would be a shame to throw lives and businesses in jeopardy without learning the exact cause of the crisis.

The WSGA respectfully asks the Government of Canada to launch an investigation into the crisis surrounding the closing and long process to reopen the XL beef plant in Brooks. The roles of all involved including the Operator, the CFIA, the USDA and Governments must be explored. Everyone from the cattle producer to the consumer holds a measure of responsibility to keep the food on our families' plates safe. A light shone will add clarity and accountability going forward.

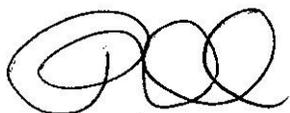
Below is a list of unanswered questions a thorough investigation should ask.

1. When an outside audit conducted in May by Silliker Inc found that sampling of trim product was "inconsistent" with the standard, why was not a Corrective Action Request (CAR) issued?
2. When a 2010 survey by FSIS indicated that the majority of the largest meat packers diverted or destroyed all trim in a batch or on a day if 5% of its tests were positive for E.coli O157:H7 and the HACCP plan for XL only diverted product if more than 10% of a batch tested positive or more than 20% of the days production was tainted, why did the CFIA approve this process?
3. Were the 6 CARs issued in September to XL Foods Inc. the result of new infractions or were they missed previously by CFIA inspectors?
4. Were there any disciplinary actions given to CFIA employees?
5. Between Sept 17th and Oct 12th, CFIA issued seventeen Health Hazard Alert updates, each of which has expanded the list of recalled products to the point where it is currently in excess of 1800 products and an estimated recall of 45 million pounds. What parameters did CFIA use in making these decisions?
6. As seventeen Health Hazard Alerts is very high considering it was for the same event, did the CFIA give any thought or regard for the damage to the reputation of the beef industry?
7. Is there any financial compensation for recalled product?
8. Of the recalled shipments of beef, how many tests were positive for E.coli O157:H7?

9. What is the percent of positives in relation to the total number of tests taken?
10. Is it unusual to recall whole muscle cuts and why was it deemed necessary in this situation?
11. Why did the CFIA not think it would be useful to require companies to analyze test results for the potentially fatal E.coli O157:H7?
12. Why were most of the CFIA at the plant not trained in Compliance Verification System (CVS)?
13. Does CFIA have the resources to deliver the training any faster and enough inspectors to relieve those away being trained?
14. How long does it take to achieve CVS training and what is the cost per inspector?
15. The Canadian Traceability System is comprised of two components that being on the live side the Canadian Cattle Identification Agency (CCIA) and Canadian Food Product Traceability (CFPT) pertaining to the processed food. Why is the CCIA mandatory and punishable by fines whereas the CFPT is voluntary and participation is much lower with no consequences of non-compliance?
16. Following the discovery of BSE, the CFIA implemented a number of changes to the regulations that dramatically increased the cost of processing animals. None of the 19 cases that have been discovered since that time would have made the food chain with regulations that were in place prior to BSE and yet we still have that cost which affects our competitiveness internationally. The food system in Canada is safe with an average of 440 E.coli cases / year. That is nearly half the rate of incidence in 2006. In a study of CDC statistics, 52% of E.coli infections could be traced to food and less than half of those were traced to ground beef. A third of the cases were traced to produce. If you want zero tolerance to E.coli, food will have to be sold either pre-cooked or canned. Are there any suggested changes to our regulatory system that would increase our cost of production and guarantee a dramatic reduction in the potential of an outbreak like this from ever re-occurring?

We look forward to hearing from you.

Sincerely,



Phil Rowland
President, WSGA

CC:/ Alberta Premier Alison Redford, Alberta Agriculture Minister Verlyn Olson, BC Premier Christy Clark, BC Agriculture Minister Norm Letnick, Saskatchewan Premier Brad Wall, Saskatchewan Agriculture Minister Lyle Stewart, Manitoba Premier Greg Selinger, Manitoba Agriculture Minister Ron Kostyshyn