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Submission by the
National Farmers Union
to the
House of Commons
Standing Committee on
Agriculture and Agri-Food
Ottawa, Ontario

On Bill C-27,
*Canadian Food Inspection Agency
Enforcement Act*

April 5, 2005

**Executive Summary of recommendations
with respect to Bill C-27,
Submitted by the National Farmers Union
to the House of Commons Standing Committee on Agriculture
April 5, 2005.**

1. Bill C-27 facilitates harmonization of standards, processes, rules and regulations with major trading partners, in particular the United States. If this Bill is passed, the CFIA could enter into arrangements with the US Government, or private agencies in the United States, to accept US legal requirements, processing and inspection systems, monitoring requirements and facilities as equivalent to those in Canada. Thus, products such as genetically-modified crops or processes such as meat irradiation may be introduced into Canada automatically. **The NFU recommends that Bill C-27 be rejected, and that the Government of Canada retain independence with respect to establishing food safety standards and trade protocols.**

2. Bill C-27 expands the Canadian Food Inspection Agency's (CFIA) regulatory and enforcement authority, without ensuring adequate checks and balances. The Bill provides protection from liability for the CFIA and its accredited agencies and governments, but fails to include any measures to compensate farmers, the public or businesses which may be unfairly prosecuted under the legislation. **The NFU recommends that there be stronger checks and balances on the CFIA, and that the CFIA and its accredited agencies be liable for their actions and decisions.**

3. Bill C-27 lays the groundwork for future regulations which will not be subject to Parliamentary review or public scrutiny, but will carry significant implications for policy direction. **The NFU recommends that regulatory initiatives which bear directly on the public interest receive appropriate Parliamentary scrutiny and meaningful public input.**

4. Bill C-27, in adherence to the so-called "Smart Regulation" framework, legitimizes a "risk-management" model to measure costs and benefits of future regulations. CFIA's dual mandate of ensuring public safety while boosting increased trade will, therefore, shift increasingly toward trade facilitation. By adopting a sliding-scale definition of "acceptable risk", regulations will be implemented based on readily-measurable financial gain rather than less easily-quantified public safety. **The NFU recommends the "risk-management" model inherent in the so-called "Smart Regulation" framework be rejected. The NFU further recommends that the dual mandate of the CFIA be abandoned, and that the CFIA be solely concerned with regulation for health, safety and the integrity of Canadian food.**

5. It is apparent from the record of the CFIA in dealing with outbreaks of Bovine Spongiform Encephalopathy (BSE) and Avian Flu that corporate interests have undue influence in shaping policies which benefit large-scale processors at the expense of smaller, independent operations. **The NFU recommends implementation of a**

legislative framework with appropriate health and safety regulations that would enable farms and smaller firms to produce safe food for local and export markets.

6. Section 3 of Bill C-27 specifies the Minister may issue a license to a prescribed class that authorizes the person to be engaged in, or to operate, an establishment to engage in... (e) the preparation or sale – excluding distribution without consideration – of... seed in respect of which the *Seeds Act* applies. Currently, seed cleaning plants which handle certified seed must be licensed, but those which custom clean common seed do not. Future regulations may allow the CFIA to dictate that **all** custom seed cleaners must be licensed. **The NFU recommends that custom seed cleaners which do not clean certified seed remain free of licensing requirements.**

7. Section 25 (1) of Bill C-27 lays out the scope of CFIA-certified inspectors' authority with respect to inspections, including (k) "require any person to present a list of persons to whom a regulated product has been distributed as well as any other relevant information necessary for the Agency to locate the regulated product;.." This may force seed cleaners to turn over their customer list to CFIA-accredited enforcement agencies. **The NFU recommends the privacy of seed cleaners' customer lists be protected.**

8. Section 53 (2) of Bill C-27 extends the time limitation under which proceedings may be instituted under the *Seeds Act* from two years to three years. Seed is the only commodity singled out for extension. **The NFU recommends the limitation period for proceedings under the *Seeds Act* remain at 2 years.**

9. Section 8 of Bill C-27 allows the CFIA to disclose information on Canadians to any government agency, department of government or prescribed organization, in Canada or elsewhere, for the purpose of administering or enforcing any law or carrying out an investigation. This is a sweeping provision which increases the CFIA's ability to collect information on Canadians and provide that information to other governments. At the same time, however, Bill C-27 does not balance that increased power by requiring the CFIA to disclose its test results, inspection results, or rationale for its decisions. **The NFU recommends the CFIA's disclosure requirements be adjusted to make the CFIA more accountable for its actions and decisions while ensuring Canadians' privacy is protected.**

10. Sections 9, 10 and 11 allow the CFIA to enter into arrangements with foreign governments or agencies to certify export standards, inspection requirements, and other measures. This measure will automatically compel Canada to approve products and processes already approved in the US. **The NFU recommends that Canada retain independent standards to ensure the health and safety of the Canadian public and the standards of Canadian agricultural commodities are not compromised for the sake of facilitating market approval processes.**

11. Sections 56 spells out the types of regulations the Governor in Council may impose, including issuing of licenses and requirements respecting recognition of foreign inspection systems. Section 57 allows future regulations to incorporate reference

material produced by outside organizations. Regulations could be based on decisions and processes made outside Canada. **The NFU recommends regulations be made in Canada in the public interest.**

Introduction

The National Farmers Union (NFU) welcomes this opportunity to present its views on Bill C-27, the *CFIA Enforcement Act*, to the House of Commons Standing Committee on Agriculture and Agri-Food.

The NFU is a nation-wide, direct-membership, democratic organization made up entirely of family farmers. The NFU is committed to maintaining the family farm as the primary food producing unit, strengthening rural communities and building environmentally-sound, sustainable local economies.

The NFU has long held a strong position supporting high standards for food safety in Canada and globally. We believe that a food production system based on the family farm model provides the best guarantee of ensuring long-term food safety. Family farmers have a vested interest in producing healthy food, and when they receive adequate returns for their commodities from the marketplace, they are able to employ production practices which are in the best interests of consumers, the environment, their livestock and crops, and their communities.

In contrast, highly capital-intensive crop and livestock operations which depend heavily on expensive inputs are in a much more vulnerable position. They are forced to extract proportionately more from their land and water resources in order to remain financially viable. These intensive operations may spread diseases more easily because of large numbers of livestock in close quarters.

We believe that with appropriate regulations, the family farm model is the most efficient, as well as the safest, food production system.

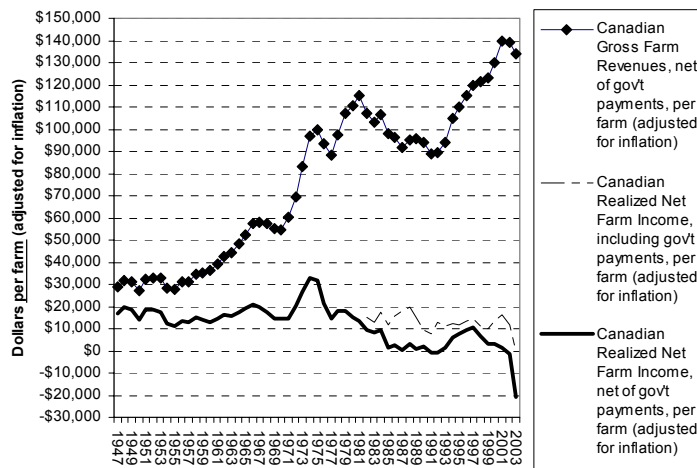
The Farm Income Crisis

Unfortunately, a disproportionate percentage of the costs associated with Canada's food safety framework have fallen, and continue to fall, on the shoulders of farmers. This is happening at a time when farmers are facing the worst farm income crisis in many years. The legislative measures contained in Bill C-27, along with other initiatives, dovetail into a larger agenda which will further add to farmers' costs. These other major initiatives include: 1) Proposed amendments to the *Plant Breeders' Rights (PBR) Act*; 2) Bill C-40, changes to the *Canada Grain Act* and the *Canada Transportation Act*; and 3) cutbacks to publicly-funded plant breeding and agronomic research. At the same time, farmers are also confronted with pressure on the Canadian Wheat Board (CWB) from the World Trade Organization (WTO), and lack of government action to prevent further market consolidation by the dominant meat packers in Canada.

The federal government is pursuing a policy of boosting exports by instituting regulations which facilitate trade. Increased exports have led to higher gross farm revenues as a result of higher production and trade volumes. At the same time, however, realized net farm income continues to decline dramatically. The farmer is handling more money, but he or she is holding onto proportionately less. Input suppliers, processors and retailers are capturing an increasing share of the market returns at the expense of the farmer. This endangers the family farm structure, and places excessive dependence on corporate traders. The NFU contends that tailoring Canada’s regulatory framework to fit an agenda based on expanding trade volumes places our nation in a vulnerable position with respect to food safety and food security.

Canadian Gross Revenue and Net Farm Income 1947-2003

(Source: Statistics Canada)



The context for Bill C-27: Increased trade given higher priority than public safety

Increasingly, legislation and regulations aimed at bolstering the competitive position of large-scale industrial corporations have placed smaller players in the food chain at a disadvantage. A “one-size-fits-all” approach to food safety requirements fails to recognize that smaller farms are qualitatively different, and can achieve very high health and safety standards under appropriate regulations. For example, smaller abattoirs in rural communities meet the needs of both local farmers and consumers; but it is unrealistic and unreasonable to force them to comply with federal standards requiring high technology, expensive inputs, expensive fees and large capital requirements.

Major corporations are consolidating their dominance at all stages of the food chain, from production, through processing, distribution and retailing. Bill C-27, the *CFIA Enforcement Act*, will accelerate this trend toward consolidation. It lays the groundwork for implementation of internationally-harmonized regulations which promote increased trade. In the process, it places a reduced priority on public health and safety. By instituting a “risk-management” model based on trade-offs between public safety and

increased trade, Bill C-27 will effectively undermine Canada's ability to impose independent standards and regulations, and lock Canada into a "Made in America" regulatory regime.

Increased exports to the United States have not translated into increased net farm income for farmers. In fact, the opposite is true. Farmers have seen dramatic declines in net farm income despite increased production, yields and exports. Accelerating the level of integration in the Canadian and American economies actually weakens the ability of Canadian farmers to extract premiums for commodities in which Canadian standards are clearly higher than those in the United States. The ability of the Canadian Grain Commission, for example, to regulate grain varieties and standards, is dependent on Canada's ability to maintain strong protections against mixing of US and Canadian grains, and to segregate US grain shipments within Canada.

Bill C-27, the *CFIA Enforcement Act*, will impact heavily on Canadian farmers and consumers. These are the two sectors of society which will pay the cost of changing the rules surrounding food safety and trade. Bill C-27 has been erroneously described as "housekeeping" legislation, when it in fact amounts to a major re-write of fundamental principles involving food safety. It has been earmarked as a high-priority item on the federal government's agenda for this session of the House.

Bill C-27 is a re-worked version of a portion of Bill C-80, which died on the order paper in 1999, two years after the CFIA was created. Bill C-27 constitutes the second phase of the CFIA's overall mandate – which involves consolidating new and existing inspection and enforcement provisions in eight separate pieces of legislation, including:

1. *Canada Agricultural Products Act*
2. *Fish Inspection Act*
3. *Meat Inspection Act*
4. *Seeds Act*
5. *Feeds Act*
6. *Fertilizers Act*
7. *Health of Animals Act*
8. *Plant Protection Act*

Under Bill C-27, the CFIA will continue to administer and enforce existing provisions in the *Food and Drugs Act*, as well as the *Consumer Packaging and Labelling Act*.¹

The third phase of the federal government's agenda for the CFIA will involve the creation of a series of enforcement regulations through Order in Council. These future regulations will not be subject to public scrutiny or public debate, but they will have a direct, and potentially major, impact on family farmers and Canadian consumers.

The most disturbing aspect of this legislation is that it facilitates the harmonization of standards, rules and regulations with the standards of the United States. Section 9 of Bill C-27 grants CFIA the authority to accredit foreign governments, foreign government agencies and even foreign organizations to approve exports of agricultural commodities

and food into Canada. This section also enables the CFIA to accept the standards and regulations of other countries as equivalent to Canadian standards, and sidesteps the need for Canadian regulatory approval of those imports.

The changing regulatory framework

When the CFIA was created in 1997, it was founded on a dual mandate. It was charged with not only protecting the public interest by ensuring all food produced and sold in Canada, exported out of Canada or imported into Canada was safe,² but also with facilitating exports of food and expediting free trade agreements with Canada's trading partners, particularly the United States.³ These dual responsibilities place the CFIA in a compromised position. If Canada is to ensure its food supply is safe, there must be a set of strong, national food safety standards to ensure the public interest remains our highest priority. As the CFIA itself notes in its corporate brochure, increased trade leads inevitably to increased risk:

“The volume and diversity of global trade in food, plant and animal products is increasing. For example, the approximate value of imported food, plant and animal products regulated by the CFIA increased from \$18.5 billion in 1997 to \$23.8 billion in 2001. During the same period, exports rose from \$43.3 billion to \$50 billion. While this trade has benefits for consumers and the economy, it also increases the risk that unsafe food, foreign pests or diseases might enter Canada through shipments of imported goods. A strong regulatory system that inspects and requires certification of goods entering or leaving Canada significantly reduces those risks”⁴

To maximize trade, on the other hand, Canada is required to continually lower its standards and relax its regulations to achieve a “competitive advantage”.

The federal government's clear agenda of promoting increased trade has led to an environment where considerable effort is being directed toward reassuring the public that it is protected, while public safety standards are, in reality, being downgraded.

The overall policy direction of the government is set out in the External Advisory Committee on Smart Regulations (EACSR) report, which was released in September, 2004. **This report amounts to a policy of “re-regulation” designed to ease the regulatory framework for corporations while increasing the regulatory burden on family farmers.** The EACSR report confirmed the emphasis on increased trade, and advocated harmonizing Canada's regulations and standards with the United States:

“Free trade is a cornerstone of Canadian public policy. Since the signing of the Canada-US free trade agreement (FTA) in 1989, the two-way exchange of goods and services between Canada and the United States has more than doubled to \$644.6 billion (\$1.8 billion per day). Today, 79.9% of Canadian exports are destined for the United States. Both the FTA and the North American Free Trade Agreement (NAFTA) focused on the movement of goods...NAFTA ushered in a new level of regulatory cooperation between Canada, the United States and Mexico...But Canada still faces two significant challenges to improving regulatory performance and economic competitiveness.

First, Canada and the United States maintain parallel processes and structures across almost all areas of regulatory activity...The committee believes that Canada must take a more deliberate and strategic approach to regulatory cooperation with NAFTA partners...The short-term objective is to achieve compatible standards and regulation in areas that would make the Canadian economy more efficient...It requires the removal of regulatory impediments to an integrated North American market...Over the longer term, Canada should work with its NAFTA partners...to build greater mutual understanding and trust in each other's regulatory processes and decisions... ”⁵

The EACSR report recognizes that “harmonizing” standards with the United States will mean lowering Canadian standards:

“Stakeholders and federal department have noted that it may at times be difficult to engage the United States in cooperative regulatory initiatives...it may be in the public interest for Canada to be pragmatic and simply align its approach with that of the United States...Alignment may not be possible in areas where Canada-US interests diverge and where there are significant policy differences. In these cases, measures should be put in place to reduce the impact of regulatory differences. They could include arrangements to share information, implement common data collection, risk assessment and decision-making procedures, and conduct joint reviews.”⁶

In order to justify the watering down of public health and safety standards, the EACSR recommended re-jigging the definition of the “public interest”. By adopting a “risk-management” approach to measuring costs and benefits, the government can justify exposing the public to a greater degree of risk if it entails even higher financial benefits from increased trade for the country as a whole.

“...the CFIA's strategic planning framework will strive to balance consumer and industry interests and allocate resources to areas of highest risk.”⁷

In order to bring the public on-side, however, this approach will require the use of sophisticated marketing techniques:

“...the regulatory system must instill trust, confidence and credibility at home and abroad in Canadian products and services, markets and government institutions. This is important because I would argue that this trust has both an economic and social cohesion value but also because, if the trust is lost, it leads to an increased demand for regulation...In the regulatory world, there is no difference between perception and reality.”⁸

Bill C-27 expands the CFIA's enforcement authority as part of the overall agenda of “re-regulation”, however, it falls short of ensuring adequate checks and balances. The Bill provides protection from liability for the CFIA and its accredited agencies and governments, but fails to include any measures to compensate farmers, the public or businesses which may be unfairly prosecuted under the legislation.

Lowering public safety standards

As corporate concentration has increased, regulatory agencies in Canada have followed the US model of scaling back their inspection efforts in favour of “monitoring” and

increasing reliance on “accredited” private agencies operating under contract. In the United States, the US Department of Agriculture (USDA) has been described by analyst Andrew Nikiforuk as “a bona-fide captive agent of Big Beef.”⁹ Nikiforuk cites political contributions by major packers and restaurant chains to the Republicans, and the revolving door between the US Cattlemen’s Association and the USDA. Regulatory changes in the 1990s included cutting 1400 inspectors across the US, reassigning inspectors to desk jobs and introducing Hazardous Analysis and Critical Control Point (HACCP) systems (“otherwise known as Have Another Cup of Coffee and Pray” systems.)¹⁰

The CFIA has likewise reduced its level of monitoring. According to Nikiforuk, “we went from a Cadillac system to a wrecked car, and it was this system that found that one BSE case more or less as an accident.”¹¹ Farmers are expected to produce more and to export more, but it is apparently up to farmers to assume full liability for the increased risks.

The CFIA’s response to the outbreak of Avian Flu in the lower mainland of British Columbia in the summer of 2004 resulted in considerable damage to many heritage breeders and flocks which may not even have been at risk. Small operators, which were erroneously blamed for the outbreak, lost an estimated \$340 million, and have never been adequately compensated.¹² The Avian Flu outbreak led to the cull of 17 million chickens, turkeys and ducks. The vast majority of culled birds (15.7 million) were uninfected, but they were wiped out in an effort to protect the multi-billion dollar food export sector. The primary points of vulnerability for the spread of Avian Flu are the large poultry barns, where viruses have the potential to mutate quickly as they spread through the flock. “Just passing the virus to 3,000 or 4,000 chickens is enough to change a harmless virus into something more pathogenic,” stated Carolyn Inch, a veterinarian and national manager of disease control for the CFIA.¹³ It is likely the rapid spread of the virus resulted from sharing equipment and staff, including crews of “chicken-catchers” traveling barn to barn to load the animals onto trucks for transport to slaughter.

It is apparent from the record of the CFIA in dealing with outbreaks of BSE and Avian Flu that corporate interests have undue influence in shaping policies which benefit large-scale processors at the expense of smaller, independent operations.

Seed Cleaners targeted

A number of sections in Bill C-27 which relate to the *Seeds Act* are a concern for farmers. The vast majority of farmers in Canada rely to various extents on farm-saved seed for planting each spring, and they utilize the services of custom seed cleaners situated in rural communities. Currently, seed cleaners who clean certified seed must be licensed, but operations which do custom work to clean common seed currently do not need a license.

Section 3 of Bill C-27 specifies the Minister may issue a license to a prescribed class that authorizes the person to be engaged in, or to operate an establishment to engage in...(3)

the preparation or sale – excluding distribution without consideration – of...seed in respect of which the *Seeds Act* applies.” This section appears to broaden the scope of those operations which will require licensing. When this Act is looked at in the context of potential amendments to the *Plant Breeders Rights (PBR) Act*, independent seed cleaners will very likely be targeted as “choke points” for enforcement of royalties on protected seed under the *PBR Act*. Section 25 (1) (k) of the Bill states CFIA-certified inspectors have the authority to “require any person to present a list of persons to whom a regulated product has been distributed as well as any other relevant information necessary for the Agency to locate the regulated product...” This section appears to enshrine sweeping new authority to CFIA-accredited enforcement agencies to demand, and receive, complete lists of clients from seed cleaners.

The CFIA also grants itself an extra year in which to pursue actions against alleged violators of the *Seeds Act*. Section 53 (2) extends the time limitation under which proceedings may be initiated under the *Seeds Act* from two years to three years. Other commodities under the CFIA’s jurisdiction will still be governed by a two-year limitation on legal proceedings. Why the need to extend the ability to prosecute farmers by an extra year?

Disclosure of information

Section 8 of Bill C-27 allows the CFIA to disclose information on Canadians to any government agency, department of government or prescribed organization, in Canada or elsewhere, for the purpose of administering or enforcing any law or carrying out an investigation. This is a sweeping provision which increases the CFIA’s ability to collect information on Canadians and provide that information to other governments. There is a potential for abuse by foreign governments and organizations which are not governed by Canada’s privacy and access to information laws.

While increasing the CFIA’s ability to collect information on Canadians, Bill C-27 fails to balance that increased power by requiring the CFIA to disclose its test results, inspection results or rationale for its decisions.

Foreign inspection arrangements

Section 9 of Bill C-27 allows the CFIA to enter into arrangements with a foreign government or foreign agencies to certify standards, processes, legal requirements and facilities related to importing and exporting regulated products into and out of Canada. As long as the systems are “comparable” to Canadian systems, then little or no independent Canadian inspection is required. Under the terms of this law, the CFIA is granted sole authority to accredit foreign bodies. Even the Minister of Agriculture need not be notified beforehand of such accreditation. The Minister will find out after the fact.

Section 10 further extends the harmonization of inspection systems and compliance requirements between Canada and its trading partners, with the aim of facilitating easier access. It certainly does little to strengthen Canadian safeguards aimed at preventing the

inflow of commodities which may be unsafe. Section 10 (d) allows the CFIA to “implement any program or project related to the inspection of products and make funding arrangements for that purpose, including the sharing of revenues or the recovery of costs of the program or project.” This section lays the groundwork for introduction of “cost-recovery” fees which will inevitably filter down to the level of the individual farmer.

Section 11 permits the CFIA to rely entirely on inspections by a CFIA-accredited foreign government or agency to certify commodities entering Canada, with no allowance for monitoring or inspection in Canada.

Permanent injunctions

Section 23 grants the CFIA the authority to apply to the courts for permanent injunctions to stop persons from committing an offence, whether or not it has undertaken prosecution in respect of the offence. This marks a major expansion in the CFIA’s authority, and begs the question of why it is required. The potential for abuse of permanent injunctions by the CFIA must be taken seriously, particularly since Bill C-27 specifically exempts the CFIA from liability for its actions. Persons who have been unfairly treated by the CFIA have no appeal mechanisms built into C-27, and their only recourse will be to pursue civil action.

Search and seizure of assets

Sections 31 and 32 of Bill C-27 allows CFIA-accredited inspectors the authority to search for and seize any regulated product “in relation to which an offence against an Agency-related Act has been committed or that will afford evidence of such an offence”. Under Section 36, these assets are forfeited to the Crown if they remain unclaimed or if the person charged under the Act consents to the forfeiture or is found guilty of the offence. All costs associated with such costs as delivery and storage are charged to the individual. Section 45, however, explicitly exempts the CFIA from any liability for “any loss, damage or costs, including rent or fees, resulting from a person being required to do anything to comply with this Act or the regulations.” There is no appeal under this Act.

Regulations

Section 56 of Bill C-27 spells out the types of regulations the Governor in Council may impose, including issuing of licenses and requirements respecting recognition of foreign inspection systems. Section 57 allows future regulations to incorporate reference material produced by outside organizations. Regulations could be based on decisions and processes made outside Canada.

Conclusion

The National Farmers Union strongly recommends that Bill C-27 be rejected. The legislation lays the groundwork for harmonization of standards, processes, rules and regulations with major trading partners, in particular the United States. The Bill expands the CFIA's regulatory and enforcement authority without ensuring adequate checks and balances. The CFIA is already influenced heavily by large-scale industrial interests. This bill is designed to further "re-regulate" the food industry along the lines specified in the External Committee on Smart Regulation – easing the regulatory burden on corporations while increasing the level of regulatory compliance on family farmers.

This bill, in conjunction with proposed changes to the *Plant Breeders' Rights Act*, creates conditions for increased control of the seed system by the global giants in the seed industry, and imposes further restrictions on farmers' rights to save and re-use seed.

Recommendations

1. Bill C-27 be rejected, and the Government of Canada retain independence with respect to establishing food safety standards and trade regulations.
2. Increased checks and balances are needed for the CFIA. The CFIA and accredited agencies should be held liable where appropriate.
3. Regulatory initiatives which bear directly on the public interest should receive appropriate Parliamentary scrutiny and meaningful public input.
4. The sliding scale for risk assessment should be abandoned; and protection of public health and safety restored as the sole priority for CFIA. The CFIA should be removed from its role in trade negotiations. Responsibility for the CFIA should be transferred to the Minister of Health, so the CFIA will be solely concerned with regulation for health, safety and the integrity of Canadian food.
5. Appropriate regulations should be implemented to encourage smaller-scale and community-based processing.
6. No change to licensing requirements for custom cleaners of common seed.
7. Privacy of seed cleaners' customer lists be ensured.
8. Limitation period for proceedings under the Seeds Act remain at 2 years.
9. CFIA's disclosure requirements be adjusted to make CFIA more accountable.
10. Canada should retain independent standards, and regulations should be made based on protecting public health and safety rather than facilitating increased trade.

**All of which is respectfully submitted
By the
National Farmers Union**



¹ Legislative Summary (LS-500E) of Bill C-27, *Canadian Food Inspection Agency Enforcement Act* – Parliamentary Information and Research Service, David Johansen, Law and Government Division, January 13, 2005. Library of Parliament.

² “**Objective for Food and Food Products:** To contribute to a safe food supply and accurate product information.”; “The focus of the CFIA food inspection program is to verify that manufacturers, importers and distributors, regulated by the CFIA, meet federal standards for safety, quality, quantity, composition, handling, identity, processing, package and labeling.” Canadian Food Inspection Agency Annual Report, 1997-98, Page 2; www.inspection.gc.ca/English/corpaffr/ar/ar98/act1e.shtml

³ “**Objective for Market Access:** To facilitate trade in food, animals, plants and their products.” “The CFIA facilitates international and interprovincial trade through government-to-government consultations and negotiations.” Canadian Food Inspection Agency Annual Report, 1997-98, Page 19; www.inspection.gc.ca/English/corpaffr/ar/ar98/art1e.shtml

⁴ **Increasing globalization of trade**, CFIA corporate brochure, 2001. www.inspection.gc.ca/english/corpaffr/publications/brochuree.shtml

⁵ **North American Cooperation, Smart Regulation: A Regulatory Strategy for Canada. Report to the Government of Canada**, External Advisory Committee on Smart Regulation, September 2004. Page 20.

⁶ **North American Cooperation, Smart Regulation: A Regulatory Strategy for Canada. Report to the Government of Canada**, External Advisory Committee on Smart Regulation, September, 2004. Page 21

⁷ **Increasing demands for CFIA Services**, CFIA corporate brochure, 2001. www.inspection.gc.ca/english/corpaffr/publications/brochuree.shtml

⁸ **The Role of the Regulator**, speech by Gaétan Lussier, Chair, External Advisory Committee on Smart Regulation, September 23, 2003

⁹ **BSE Crisis reveals consequences of corporate concentration**, by Terry Pugh, Union Farmer Quarterly, Winter 2004-2005.

¹⁰ **BSE Crisis reveals consequences of corporate concentration**, by Terry Pugh, Union Farmer Quarterly, Winter 2004-2005

¹¹ **BSE Crisis reveals consequences of corporate concentration**, by Terry Pugh, Union Farmer Quarterly, Winter 2004-2005

¹² **Bird flu defeated – at high cost**, by Stephen Leahy, InterPress News Service, August 27, 2004

¹³ **Bird flu defeated – at high cost**, by Stephen Leahy, InterPress News Service, August 27, 2004