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Chair: Mr. Ken McDonald





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• (1100)

[English]

**The Chair (Mr. Ken McDonald (Avalon, Lib.)):** I call this meeting to order.

Welcome to meeting number 10 of the House of Commons Standing Committee on Fisheries and Oceans. Pursuant to Standing Order 108(2) and the motion adopted on January 18, 2022, the committee is resuming its study of the traceability of fish and seafood products.

This meeting, of course, is taking place in a hybrid format, pursuant to the House order of November 25, 2021. Interpretation services are available for this meeting. Please inform me immediately if interpretation is lost and we'll ensure it is restored before resuming.

We have a number of witnesses, but before I introduce them, I will say that the clerk has told me the volume in the room is very high. It would be much better if members could keep their mikes turned down and use the earpiece to hear, because it may interfere with the interpreters' ability to follow the meeting the way they would like to.

For our witnesses, as an individual, we have Monsieur Charlebois, who is a professor with the Agri-Food Analytics Lab at Dalhousie University; from Fumoir Grizzly Incorporated, we have Laura Boivin, chief executive officer; and from Safe Quality Seafood Associates, we have Mr. Scott Zimmerman, chief executive officer. That's two names with "Zimmer" in them this meeting. That might be a problem.

We will now proceed with opening remarks from Mr. Charlebois, for five minutes or less, please.

**Dr. Sylvain Charlebois (Professor, Agri-Food Analytics Lab, Dalhousie University, As an Individual):** Thank you, Mr. Chair, committee members, fellow witnesses and participants.

I want to thank the committee for inviting me to speak about the seafood industry and traceability. Being from Nova Scotia, where the fish and seafood industry plays a large role in our economy, I feel very privileged to be speaking to you today.

Over the years, many reports in Canada have suggested that seafood fraud cases are rampant here. We believe that anywhere between 25% to 60% of fish and seafood served at restaurants in Canada is mislabelled, and up to 10% to 15% of fish and seafood products sold at retail in Canada is also mislabelled. While seafood

fraud is a global problem, Canada is known to be lagging in food traceability overall when benchmarked to other countries.

For this committee today, I would like to make the following overarching, principal recommendations for a stronger traceability program for seafood in the country.

Recommendation number one is that the fish and seafood industries are a global enterprise. Any comprehensive approach to traceability would need to accept this as fact. The current deficit of standard informational obligations in seafood leads to lack of interoperability. This, in turn, diminishes transparency and thus inhibits traceability. This issue impacts business efficiency and enables the conditions that can lead to illicit activity. Many technologies exist, but they don't go far enough. If we are to believe that sustainable fishing is possible, programs like the not-for-profit Marine Stewardship Council, which I think you're inviting to this committee, can discipline the entire industry while reassuring the public. Such a model transcends borders. This strict supply chain certification, which uses random DNA tests, helps ensure that MSC-certified seafood is always labelled correctly and kept separate from non-certified options. It is a worthy model. The use of such a model should be encouraged.

Recommendation number two is that traceability is a tool. It already has demonstrated benefits in other industries such as pharmaceuticals, automotive, high tech and aeronautics. At first, regulatory food safety-related requirements pushed more adoption of traceability systems and practices, but the business and financial benefits related to food integrity will drive and sustain its use. Many technologies already exist, but the focus has mainly been one-up, one-down. In fish and seafood that's not enough. Today, food integrity and the threat of food fraud is certainly a motivating factor, and based on our research, food integrity has more market currency today than food safety. Rewarding companies that adopt better transversal traceability practices would be a step forward. Encouraging the use of technologies like machine vision, the Internet of things and blockchain to automate the processes and take human error or deception out of the equation would be key.

Recommendation number three is that seafood businesses that are committed to maximizing the value they deliver to consumers are already using relevant, dependable and readily accessible data about their products to gain a competitive advantage and grow their businesses. While globally there has been some progress on mitigating illegal, unreported or unregulated fishing, recent information suggests that awareness of the consequences of illicit activity is not deterring offenders. Perhaps Canadians are uninformed of the problem, so building public awareness about food fraud would be key.

I'd like to thank the committee for listening to me. These are my main recommendations. I would welcome any questions the committee has at this time.

• (1105)

**The Chair:** Thank you for that.

We'll now go to Madame Boivin for five minutes or less, please.

[*Translation*]

**Mrs. Laura Boivin (Chief Executive Officer, Fumoir Grizzly Inc.):** Good morning, everyone.

Thank you so much for having me here today. It is an honour for me to address you.

I am Laura Boivin, president and co-shareholder of Fumoir Grizzly for 12 years now. Fumoir Grizzly is a small business located in the province of Quebec. We currently have 95 employees and we produce several species of salmon as well as tuna, mostly smoked salmon and tartars that are distributed to most retailers and to restaurants, hotels and institutions.

We process five species of fish, including wild sockeye salmon, wild chum salmon, coho salmon, Atlantic salmon, farmed trout and tuna.

Today, I would like to highlight a few important things about Fumoir Grizzly as a fish processing company. I don't necessarily have an array of recommendations for you, but I will instead have some requests for you to consider.

First, what is confusing for the consumer is where the fish comes from. On the packaging of imported products, the origin related to the processing, farming or catching of the fish will be indicated. This is not clear and there is a lot of confusion. I myself have seen several labels on grocery shop packages that didn't have the right information on them, which means that the end consumer was misinformed.

Some labels on packages also contain claims that cannot be verified or are not verifiable. So you can say just about anything. I'm just thinking of the words "no antibiotics" or "with antibiotics" that are sometimes found on the packaging. At what stage in the company's value chain were antibiotics used or not used? There are no clear rules on this, and in my opinion, the rules can be confusing to the end consumer.

Then there is also the naming of the fish itself. In our industry, we have Atlantic salmon. There have already been advertising campaigns to inform the end consumer, but the name Atlantic salmon is not linked to its provenance, but rather to the different genetics that

is specific to the *Salmo salar* species. It may come from British Columbia, Chile or Norway. The end consumer is not aware of this.

As for genetics, there can also be confusion regarding Pacific salmon, as a farmed salmon could have grown up in the Pacific Ocean in Chile. A wild salmon may be sockeye, king or chum. The packaging may simply state that it is wild Pacific salmon, when it could just as easily be a fish that is found in abundance in the ocean as a rare fish, with very different prices.

I would like to address the issue of transgenic salmon. I don't know if members of the committee have heard of it. We became aware of this salmon a few years ago. There was a lot of outrage from grocery shop chains that refused to sell it. The situation with transgenic salmon is unique in Canada in that there is no requirement to label it as transgenic salmon on the package, whether in restaurants, at the counter in fish shops, or wherever it will be consumed. The end consumer therefore does not know whether they are consuming transgenic salmon or not.

That being said, there are no health problems associated with transgenic salmon. I don't have a formal position on that, other than to say that it's not mentioned and that it should be addressed, in a context where we want to place importance on the traceability of fish.

In general, I will end by telling you that there are many standards that fish suppliers and processors must meet in terms of traceability. Fumoir Grizzly follows Hazard Analysis Critical Control Point, or HACCP, standards, and is also certified by the Safe Quality Food, or SQF, program and the Aquaculture Stewardship Council, or ASC. In addition, our suppliers are certified by the Marine Stewardship Council, or MSC, and by the Best Aquaculture Practices, or BAP, program. There are many rules related to traceability, and this requires integrated systems in the processing plants.

My only comment this morning is that we shouldn't add to the processing costs, which are already very high. Adding rules as to traceability, given the certification systems that are already in place, would probably add costs and not prevent us from needing those certifications.

• (1110)

Fumoir Grizzly submitted an application for ASC certification last week related to traceability. It has been audited and the only thing we had to change in our process was the position of the logo on our supplier's boxes. Certification with this organization will mean additional costs of 0.05% of sales volume. At the end of the day, it was found that traceability was well assured at Fumoir Grizzly.

It should be taken into account that certification bodies already exist, and we are joining them as a processing company. We need to avoid additional costs, and most importantly, we need to ensure that our existing regulations and certifications are applied to all products, including those exported to Canada.

Thank you for your attention. I would be happy to answer any questions you may have.

[English]

**The Chair:** Thank you for that.

We'll now go to Mr. Scott Zimmerman.

You have five minutes or less, please.

**Mr. Scott Zimmerman (Chief Executive Officer, Safe Quality Seafood Associates):** Good morning, everybody. Thank you for inviting me to speak with you. I find it an honour to speak with the Canadian government, so I appreciate your time.

My name is Scott Zimmerman. I own a company here called Safe Quality Seafood Associates. We're a consultancy. I'm basically an external quality assurance and quality control person. I work for the industry, I work for FDA and I address compliance issues specific to the seafood industry.

Today I'm going to speak briefly with you folks about FDA regulations, NOAA regulations and third party requirements for traceability in the United States.

The first topic I want to touch on is a new proposed rule by the FDA that covers requirements for additional traceability outside of the "one-up, one-down" required through the bioterrorism act. This new regulation is under the new U.S. Food Safety Modernization Act, which came about in 2011 and is still being implemented. The goal of the new traceability requirements is to reduce the time needed, during an outbreak especially, to identify contaminated product. That will address one of four different core elements in FDA's new smarter era for food safety.

Going beyond one step forward and one step backward, any food that has been listed on the food traceability list, which in the case of seafood is just about every type of seafood, will require key data elements, such as temperature and traceability codes, that are collected during critical tracking events. That is especially when product is moving from one hand to another in the chain of custody. This is increasingly needed for especially ready-to-eat foods that don't have a "kill step" before the consumer opens the package and eats it.

The critical tracking events that FDA will focus on include the growing, which would include aquaculture operations, or the receiving, which would include taking raw material off a fishing vessel. The production of the food would require traceability as a critical tracking event. Different types of key data elements, such as temperature, for example, would be required to be collected at that step. Any step where raw material product is transformed would require traceability data, including shipping. FDA is going to expect all of that traceability to be collected in a sortable spreadsheet, such as an Excel spreadsheet, in order to be considered compliant.

The next traceability program I want to talk about is the National Oceanic and Atmospheric Administration's seafood import monitoring program. This is a program that's relatively new. It's required under the Magnuson-Stevens Fishery Conservation and Management Act here in the U.S. to combat illegal, unreported and unregulated fisheries or misrepresented seafood from entering the United States and entering commerce.

NOAA officers are required to conduct these audits of importers here in the U.S. and make sure that there's critical information collected at each point of movement, or the chain of custody. Currently this seafood import monitoring program is restricted to 13 imported fish and fish species groups, which means, if you look at it from a greater perspective, 1,100 unique species of fish are being traced by NOAA at this time. But there are lobbying efforts taking place here in the United States to include additional species to the seafood import monitoring program, or SIMP.

• (1115)

SIMP and NOAA have recognized that there are groups of importers in the United States who have maintained compliant programs. They've created a compliant importers list as a function of that. That's going to recognize those importers here in the U.S. that have demonstrated a history of compliance.

The last traceability component I'd like to talk about is not regulatory. It's voluntary. That's through third party certification. There are several different standard owners, such as the MSC, the ASC or Aquaculture Stewardship Council; the BAP or Best Aquaculture Practices; the BRC, which is the British Retail Consortium; and SQF or Safe Quality Food, just to name a few.

• (1120)

**The Chair:** Mr. Zimmerman, I'm going to have to leave it at that. We've gone over the five-minute mark by quite a bit. Hopefully anything else you would like to add will come out in the rounds of questioning. All members have a copy of your opening remarks as well.

We'll now go to questions.

We'll start off with Mr. Perkins for six minutes or less.

**Mr. Rick Perkins (South Shore—St. Margarets, CPC):** Thank you, Mr. Chair.

I apologize in advance to the witnesses for this slight diversion. I'd like to move a motion:

That the committee urge the government to remove Russia from the Northwest Atlantic Fisheries Organization, cutting off another important source of revenue for Russia's illegal invasion of Ukraine, and; that this motion be reported to the House.

**The Chair:** Before I can ask for any discussion or take part in anything to do with that motion, we're not actually in committee business. We're in the study and we have witnesses here. For a motion to be introduced at this time, it has to be agreed to by unanimous consent.

**Mr. Robert Morrissey (Egmont, Lib.):** Mr. Chair, on a point of order, maybe if he would delay it to the last half hour of the meeting, we could have a discussion then so that we're not taking time away from the witnesses now.

**Mr. Rick Perkins:** That's fair.

**The Chair:** Okay.

You're up for your questioning.

**Mr. Rick Perkins:** Thank you, witnesses.

This has been a fascinating study. I think we all agree on that. It's been pretty enlightening about the situation.

As committee members know, I've been focusing a bit on the consumer side of it at the point of sale. I particularly would like to welcome a fellow Nova Scotian, Professor Charlebois. My first question is for him.

We've heard a lot of testimony about testing of the accuracy of the labelling at retail. You mentioned the 10% to 15% of fish and seafood is mislabelled at the retail level and up to 40% in restaurants. We've had similar testimony from Oceana and other witnesses.

Let's focus on the retail side of it. CFIA has very minimal requirements for three basic things they require on the packaging. What additional items do you think should be mandatory on packaging for consumers?

**Dr. Sylvain Charlebois:** I think Ms. Boivin alluded to this issue of provenance. I think it's important, especially right now. A lot of people are looking for local foods. They would be reassured if the information and the data on packaging and labels is actually accurate in giving information about where the product is actually from.

This whole issue of species is quite confusing. I really enjoyed Ms. Boivin's testimony because I think it speaks to how confused consumers are. There are so many species out there, it gets confusing. It also gets confusing for retailers.

Going back to Ms. Boivin's testimony, she did talk about the genetically modified salmon. We saw many retailers, including Sobeys and Loblaws, boycotting the AquaBounty salmon, but that doesn't mean they're not selling it. They may actually be selling the product as an ingredient embedded in other products they're selling at retail.

This is why I think it's important to really start with the consumer and figure out exactly what kind of information they need at the point of sale and then work your way back to the source to make sure the data actually flows through the entire process.

**Mr. Rick Perkins:** It's been suggested by some of the other witnesses that we should include things like the scientific name, the gear with which it was caught and the location, perhaps, where it was caught. Other information around processing should be mandatory.

What are your views on that?

• (1125)

**Dr. Sylvain Charlebois:** It is a good point. Metro in Germany, which is equivalent to our Costco in Canada, would offer a QR

code. You can use your phone at the point of sale to scan the QR code and you will know exactly who caught the fish and when, when it was processed and what ingredients were added to the product before it was sold at retail. All that information is given to the consumer. Whether they want it or not, it's actually available.

**Mr. Rick Perkins:** Maybe I can pose this to both Professor Charlebois and Mr. Zimmerman.

We've had a lot of discussion about the European standards and how they've evolved, and the United States's standards appear to be a little different. If we were to make recommendations to improve where we're going with our labelling at retail and traceability, could it be done by assessing or taking up the U.S. or, more importantly, the EU standards, while at the same time reducing the burden? We also have yet a third standard: the Canadian standard. Which one would you recommend in particular? We have heard that the European Union's standards are state of the art.

**Mr. Scott Zimmerman:** My wheelhouse is U.S. requirements, so I'm not going to say that I know much about Canadian or EU standards. I do know that there's a wealth of resources for consumers and regulators to turn to at the FDA to get that information. There are videos and labelling guides.

We've been at it for a long time in the seafood industry. We like to think the guidance published by the FDA.... I don't speak on behalf of the FDA, but I do enjoy their materials and find them consumer friendly. I teach those materials on a monthly basis for the Association of Food and Drug Officials. I find them very easy to digest. I think there's a lot to be gained by going through the FDA's website, along with their guidance documents. I think it's quite clear what is expected of the industry here in the U.S.

**Dr. Sylvain Charlebois:** If I may—

**The Chair:** I'm sorry, Mr. Charlebois, but the time has expired. Hopefully somebody will get back to some similar thoughts and you'll be able to respond, or you can submit a response in writing to the committee.

We'll now go to Mr. Cormier, for six minutes or less, please.

[*Translation*]

**Mr. Serge Cormier (Acadie—Bathurst, Lib.):** Thank you, Mr. Chair.

I thank the witnesses for being with us today.

Mr. Charlebois, it's nice to see you in person. I read your opinions religiously in L'Acadie Nouvelle, in New Brunswick.

You made my job easier, because I wanted to ask you what your recommendations were for the committee, and you made three.

I would like us to talk more about the rules that are being put in place and the new certifications. The famous case of right whales being hit by ships in the Gulf of St. Lawrence has had a certain effect. I wouldn't say it was catastrophic, but it forced us to adapt.

You mentioned the new MSC standard, which has been in place for several years. Industry players seem to be saying that it is important to keep it, but that it has not had any effect.

Do you agree with the industry players that abandoning this certification would have no effect in terms of crab or lobster?

**Dr. Sylvain Charlebois:** In my opinion, Mr. Cormier, the real problem is not necessarily the companies that are seeking MSC certification, but rather the ones that are not seeking it.

I think it's a shame that companies like Ms. Boivin's, for example, follow the rules and comply with good practice, while others do not. Unfortunately, it takes police and surveillance to ensure that we get rid of companies that are doing great damage to the reputation of the industry.

I was talking about food fraud earlier and I want to emphasize that very much this morning.

• (1130)

**Mr. Serge Cormier:** I wanted to talk about food fraud a little later, but you can continue in this direction.

**Dr. Sylvain Charlebois:** Fraud is a really big problem. It's not the compliance-minded companies that are causing it, it's the companies that are not being monitored.

I have visited many companies. The ones that follow the rules are not in a position to report anything. Yet that's why—

**Mr. Serge Cormier:** For the industry, it is important to continue using the MSC standard.

Is this correct?

**Dr. Sylvain Charlebois:** In my opinion, this standard is a model. I won't go so far as to say that this is the model to follow, but it is a good model. It is robust and it is used internationally.

**Mr. Serge Cormier:** When you talk about food fraud, are you referring to fraud relating to certain products, such as seafood found in these packages?

Can it also be financial fraud or failure to declare catches?

**Dr. Sylvain Charlebois:** In my opinion, fraud is the result of putting the wrong information on a label. There are three kinds of fraud, namely smuggling, mixing of ingredients and misrepresentation.

With regard to fish and seafood, what we see most often is misrepresentation. For example, it may be a label that does not necessarily state the correct species or provenance.

**Mr. Serge Cormier:** In your opinion, does Canada have sufficiently robust import and export rules in place?

Is there room for improvement, as you have outlined in your recommendations?

**Dr. Sylvain Charlebois:** I think Canada has enough rules in place. What's important is to force companies to follow them.

**Mr. Serge Cormier:** Very well.

Thank you.

[English]

Mr. Zimmerman, I have a quick question. You're based in the U.S.A. As you know, Canada exports a lot of lobster and crab, for example, to the U.S. You talked about the certification, like the BRC and MSC. In my riding, I have something like 12 fish plants that are all moving to some of those certifications.

Do you think that the U.S. market is also looking at their certification? Will it be mandatory to have those certifications in the future to export to the U.S.?

**Mr. Scott Zimmerman:** For some of the larger companies, they're going to push. That third party certification is their insurance. However, I can't stress enough the importance of understanding that those certifications are a snapshot of what's happening at the facility and that they are only as good as the competency of that auditor during that audit.

Yes, the U.S. has started to weigh heavily on third party audits, as well, as a function of meeting the Food Safety Modernization Act requirements. These audits are going to have to be conducted. Without getting a new set of eyes into the facility and doing the walkthroughs and the traceability exercises, and challenging the quality management systems, you only have what the government can.... Do you guys have enough boots on the ground to do your own audits?

It's one thing for a big retailer to say in their policy that they require third party certification but who's auditing that they're meeting those requirements? Who's taking a closer look at the audit results as well?

**Mr. Serge Cormier:** Thank you.

[Translation]

Mrs. Boivin, is it difficult for companies to comply with the rules in place?

**Mrs. Laura Boivin:** It does require some expertise. In our factory, we have three people working full time on quality control. We consider such certifications to be necessary to enter the market. For example, we have just obtained ASC certification. We were already asking for it from our suppliers, but it is now required from some of our customers.

The cost of maintaining all these certifications is high. This adds to the final price the consumer pays, of course. Choosing a responsible supplier brings a certain constraint, for example in terms of the cost of maintaining certifications.

With regard to ASC certification, I was mentioning that you have to give a percentage on sales volume. In my opinion, the certifications we currently have are necessary, although they are difficult to maintain.

That said, I totally agree with what Mr. Charlebois said. The problem is with the application of the rules, not the current rules. Companies like ours need to maintain certifications.

• (1135)

[*English*]

**The Chair:** Thank you.

Thank you, Mr. Cormier.

We'll move on now to Madame Desbiens for six minutes or less, please.

[*Translation*]

**Mrs. Caroline Desbiens (Beauport—Côte-de-Beaupré—Île d'Orléans—Charlevoix, BQ):** Thank you, Mr. Chair.

I'd like to welcome Mrs. Boivin, from Fumoir Grizzly, a responsible business that has been in existence for 30 years in Quebec and of which we are very proud. I thank her for being here.

In fact, I thank all the witnesses. Their comments are very interesting.

Mrs. Boivin, do certifications, like ASC and MSC certifications, all have a role to play? Couldn't we group them together in a more general standard?

**Mrs. Laura Boivin:** These certifications are aimed at different niches, but ultimately they are mostly about traceability and food safety. MSC certification is for wild salmon, and ASC certification is for farmed salmon. Ultimately, these standards are about ensuring sustainable fishing, food safety and traceability.

Some certifications could probably be grouped together.

**Mrs. Caroline Desbiens:** They could also be paired. Isn't that right?

**Mrs. Laura Boivin:** Yes, they could be paired up.

For example, some U.S. chains require Monterey Bay Aquarium Seafood Watch certification, which is only found in Norway. Others require ASC certification, and still others require BAP certification. Three-star or four-star certification is required.

We have to comply with various retailer requirements, and each one obviously creates new costs.

**Mrs. Caroline Desbiens:** What would simplify your work without increasing costs?

**Mrs. Laura Boivin:** In my opinion, a responsible organization must ensure that what it provides to the end consumer is what it claims to provide.

As you suggested, the existing certifications could be grouped together, but I think they are sufficient to maintain satisfactory traceability standards. Adding more would not prevent retailers from requesting a particular certification that they feel is absolutely necessary.

Any new traceability regulation will necessarily add a burden to the existing system. What is important is to ensure compliance with the regulations in relation to imported products. In many cases, the regulations are stricter for local products than for products from

outside the country. The examples I gave you earlier were not necessarily about Canadian companies, but rather about companies that import.

More inspectors or on-the-ground monitoring is needed to ensure that what consumers are buying matches what companies claim to offer. Processors are already subject to many rules. Each rule represents an additional cost to the end consumer, because there is a limit to what we can absorb when the net margin is 5%.

**Mrs. Caroline Desbiens:** I am in complete agreement with you on this point, Mrs. Boivin.

In previous meetings, witnesses shared with us their interest in the establishment of a round table that brings together all stakeholders, big and small: processors, fishers, owner-operators, large companies and government authorities. Together, they would study the possibility of establishing a more cohesive system. I even raised the idea of creating an auditor general position for traceability and labelling.

Mr. Charlebois or Mrs. Boivin, do you have any comments on this?

• (1140)

**Dr. Sylvain Charlebois:** Thank you for the question, Mrs. Desbiens.

I have always been a supporter of the value chain approach, which was first adopted in Quebec a few years ago. This approach allows all industry players to work together and share the problems that they are facing. In my opinion, traceability affects everyone.

As I said earlier, traceability was first associated with food safety and security. Over the years, traceability has been presented as an added value, when it isn't one. It's a way of doing business, a guarantee that is offered to all players in the value chain, not just consumers.

The integrity of the chain has become critically important, and that is why, during my presentation, I insisted on the need to reward those who are doing good work to protect the integrity of the chain. In my opinion, we don't do this enough in Canada.

**Mrs. Caroline Desbiens:** That's very interesting, thank you.

I am out of time, so I will come back to this during the next round of questions.

[*English*]

**The Chair:** There is only about 10 seconds left. You wouldn't get your question in and certainly not an answer.

We'll now go to Ms. Barron for six minutes or less, please.

**Ms. Lisa Marie Barron (Nanaimo—Ladysmith, NDP):** Thank you, Chair.



Thank you to the witnesses for being here today. There is lots of good information coming our way.

I was hoping that Madame Boivin could expand a little bit on the points made about the cost to the consumer of this traceability process that's being undertaken. I'm wondering if you can expand a little bit on the consumer response to these increased prices, the impacts on the business and any changes that you think would be helpful to your business to accommodate or better serve the consumer through this process.

[Translation]

**Mrs. Laura Boivin:** I don't have a general answer to that question. However, I can tell you, for example, that the certification recently obtained by Fumoir Grizzly represents a total cost of \$100,000 annually on our products, and added to that is an annual cost of \$10,000 to \$20,000 to cover the audits for maintaining the certification. That is just the cost for this certification, and Fumoir Grizzly has several.

The last time that we calculated the cost of packaging for a specific client based on volume, it was eight cents. The certifications and the traceability process can have quite a significant impact on the cost of products.

What is the value added for the end consumer, at the end of the day? Many claim that it is significant. However, one of our certifications, Aliments du Québec, does not generate much value added for the consumer. Are consumers ready to assume the cost of this value added, given the current increase in food prices? I don't know. However, it frequently seems to me as though the consumer's response does not necessarily correspond to purchasing patterns and habits.

Mr. Charlebois, you have spoken about this often, so I won't come back to it.

Therefore, there is a cost, without a doubt. Any responsible business should have a traceability system and assume the cost of it. Are certifications necessary? If you want to sell to large retailers, you don't have a choice about having them and there is an associated cost. There is a limit to what we, as suppliers, are able to absorb. There is necessarily an additional cost that the consumer must be willing to pay.

I'm sorry that I don't have a more specific answer concerning the final cost.

[English]

**Ms. Lisa Marie Barron:** Thank you, Madam Boivin. That information you provided is helpful. I was just hoping to gain a better understanding and for you to expand on some of the points that you were making. That's helpful, but anything further that you would like to add, please feel free to send our way as well.

My next question is for Dr. Charlebois. I'm wondering if you could expand a little bit on what you think could help make Canadians more aware of the seafood products and the labelling, some educational components that you feel might be helpful for consumers to better understand the seafood they're purchasing and consuming.

• (1145)

**Dr. Sylvain Charlebois:** Thank you, Ms. Barron. That's a great question.

First of all just, to respond to add to Madame Boivin's answer on price, demand elasticity for fish and seafood is quite high. The market is not as price sensitive for those products as other products in the grocery store. I just wanted to throw that out there; it's important. Competitiveness is important, but price sensitivity is not as high.

To your point about education and awareness, about 10 years ago I started to discuss food fraud during my talks, and I had to explain what food fraud was. I don't today. I think a lot of people are aware there's a problem; they just don't understand what that problem looks like. I think education would be very important, whether it's by the CFIA or another agency. I think the CFIA should have that role of educating the public on how food fraud occurs.

There are several different scenarios. Food fraud can happen in many different ways, but I would suggest focusing on three types: adulteration, counterfeiting and misrepresentation. Those are the three categories that I think the public should know more about.

**Ms. Lisa Marie Barron:** Thank you, and I hope there will be enough time at this point, as I would like you to expand a little bit or finish what you wanted to say in response to Mr. Perkins' questions, specifically around Canada trying to match the U.S. or EU standards.

I just wanted to have an opportunity to hear a little bit more from you about that.

**Dr. Sylvain Charlebois:** Thank you for the opportunity.

In my opening remarks, in that document, I cited a benchmark report that we conducted a few years ago on traceability specifically. We compared Canada with other nations around the world, including Europe and the United States.

Now Canada is a lagging country, and in my view the EU, by far, is farther advanced in traceability standards, just because Europe is complicated and they've been able to figure out, I would say, harmonized standards amongst several nations. As I said, inherent to food fraud or fish traceability is the nature its being a global market. I'm not sure if the committee knows, but 90% of what we consume in Canada is imported and we export 90% of what we produce. It's the same in the U.S. approximately.

So it's a global problem and the EU has really made some major progress in understanding those risks relating to how global the industry is.

**Ms. Lisa Marie Barron:** Thank you.

Chair, do I have time for another question?

**The Chair:** No, we've gone over the time.

We'll go to our next round now of five-minute questioning, and Mr. Arnold, please.

**Mr. Mel Arnold (North Okanagan—Shuswap, CPC):** Thank you, Mr. Chair, and thank you to the witnesses. Today I'll start off with a couple of questions for Mr. Zimmerman.

Mr. Zimmerman, you mentioned the NOAA system and tracking of illegal, unreported and unregulated fisheries. I think you said it was restricted to 13 species. Is the current tracking system sufficient to address IUU fishing and illegal sales, or what are the gaps that need to be bridged to reduce that?

**Mr. Scott Zimmerman:** I think the industry hasn't been challenged for a long time here in the United States—some of its larger components—but it's those medium and smaller importers that have been falling underneath the radar and they continue to grow and create more of a footprint in our fisheries here in the U.S. I think there's a challenge in auditing these systems and understanding what the chains of custody are and what's natural to a fishery in another country, how many hands product moves through, and then finally whether the raw material was sourced from an IUU source.

I think there are also challenges in understanding the laws and regulations in those other countries and how NOAA auditors are able to digest those laws and whether requirements are being met in the countries of origin. That's also very concerning.

• (1150)

**Mr. Mel Arnold:** Thank you.

There was also some discussion earlier today about the certification systems and how they vary from one jurisdiction or system to another. Do you think there's a requirement for standardization or a consolidation of certification systems, and what would be the best body to oversee that?

**Mr. Scott Zimmerman:** I think there are some structures coming into place, whether it's the global Food Safety Initiative or the Global Sustainable Seafood Initiative. Those are benchmarking tools. I think it's important for them to work with the certification bodies they're accrediting to do those audits and to enable those certification bodies to basically do a harmonization or a study across the audits so that they're not auditing the same thing twice and can send one auditor and do the recall exercise, do the traceability exercise, do the quality-management system exercises, because a lot of those components are very similar to each other across standards. If these certification bodies were training their auditors to do these integrated audits, it would save a lot of those processors a lot of money. But it's up to them.

**Mr. Mel Arnold:** Thank you.

I'll switch to a question for Mr. Charlebois now. You mentioned that current rules and laws seem to be sufficient but that enforcement is lacking. Is that enforcement within Canada, enforcement in other countries, or enforcement of what's being imported into Canada? Can you elaborate a little further on that?

**Dr. Sylvain Charlebois:** I would say that the major problem I would focus on is imports, to be honest. There's a lack of surveillance, and compliance becomes an issue domestically, I would say. We do already have a lot of regulations in Canada to support our companies right here in our own backyard. Frankly, for the most part, they do a really good job. I've visited aquaculture facilities in Nova Scotia, and they are very much aware of rules.

With regard to imports, I don't think that we're monitoring enough of what comes into our own country. To Mr. Zimmerman's point, I think there is something that needs to be done there.

Going back to the MSC example, again, it's a global enterprise, a global surveillance system. DNA testing is one way to make sure that the species you have in front of you is consistent with what's on the label. A lot of grocers are focusing more on that technology.

**The Chair:** Thank you, Mr. Arnold.

We will now go to Mr. Hardie for five minutes or less, please.

**Mr. Ken Hardie (Fleetwood—Port Kells, Lib.):** Thank you, Mr. Chair, and thank you to the witnesses. This is fantastic information we're getting.

Just as a heads-up for you, Chair, I will be moving a motion a little bit later in our business section to add a day to this study. There are some people we need to talk to.

I want to focus, as Mr. Perkins has done, on the end-consumer. The end-consumer will not understand the Latin name of a species. They may not care very much about the type of gear used, or anything else. There are people who do care for good reasons. We need to think about ways, perhaps through recommendations, of helping the end-consumer know at a glance what they're buying.

I'll start with you, Professor Charlebois. Is it professor or doctor, or either one?

**Dr. Sylvain Charlebois:** It's either one.

**Mr. Ken Hardie:** Okay.

Perhaps I'll start with Madame Boivin as well.

Let's look at the trail of the fish from the time it's caught to the time it ends up on somebody's plate. Who has the pen when it comes to the labelling? Who has the opportunity to label that fish or to change the labelling on that fish? We have processors, wholesalers, retailers and restaurants. Are there other people or other entities in that chain that have an opportunity to influence the label?

Professor Charlebois.

• (1155)

**Dr. Sylvain Charlebois:** Absolutely. I think your opening comment was quite important here.

When I talk about food fraud, I often say to people that if you walk into a sushi place—before COVID—and it's an “all you can eat” sushi bar for \$15 a person, you have to ask yourself some questions. This is really the problem. It's the will to ask the right questions. The power belongs to the consumer in the end. The last thing that our five major...want is a food fraud scandal. I would include Loblaw's, Sobeys, Metro—

**Mr. Ken Hardie:** I do understand that, but I need to get a precise answer to the question.

By the way, we had a sushi place in Metrotown in Burnaby that was right next to a pet store. I didn't want to throw that in, but....

Who actually has control of the label along the supply chain?

Madame Boivin, do you have any thoughts on that?

[*Translation*]

**Mrs. Laura Boivin:** In fact, the information related to labelling can be transmitted at any step in the food chain. It can be posted on the menu board of a restaurant, for example, where the origin of the trout being served could be posted, or by means of a small sign posted on the front of the fish counter at the grocery store.

That said, there are many inspection bodies. For example, in Quebec, there is the ministry of agriculture, fisheries and food, or MAPAQ. Everything depends on the type of certification obtained by an organization, and whether or not the certification falls under federal regulation. For example, MAPAQ can ensure that the product has not been misrepresented. If a grocery store has a smoker, the standards will be different. It really varies from one place to another.

Could federal standards apply to what is written on a menu board in a restaurant? Who will ensure that the standards are followed?

Despite all possible goodwill, I doubt that compliance with these standards can be ensured, since the current Canadian regulations are not being enforced and products in violation of the regulations are easy to find on supermarket shelves.

I understand that we want to equip ourselves with very broad standards, but I don't believe that it is possible to enforce them, given our current resources.

[*English*]

**Mr. Ken Hardie:** I have to throw this open because I don't know who could answer the question.

Is there somebody in the supply chain who is really the pivot point for the veracity of the labelling of the fish, or somebody who could be, if you like, deputized to be responsible for the accuracy of the label?

I would look at, for instance, the wholesaler who would perhaps buy from the processor and then distribute to everybody else, but I don't know. Are there any suggestions there?

**The Chair:** Thank you, Mr. Hardie. You're out of time.

If our witnesses have any suggestions, perhaps they could provide the answer in writing.

Thank you.

We'll now go to Madame Desbiens for two and a half minutes, please.

[*Translation*]

**Mrs. Caroline Desbiens:** Thank you, Mr. Chair.

I'll allow Mr. Charlebois to answer Mr. Hardy's question, because the subject is a very important one. We want to hear this information.

Mr. Charlebois, can you answer the question?

**Dr. Sylvain Charlebois:** Thank you, Mrs. Desbiens.

Mr. Hardy's question is somewhat complex. A distinction needs to be drawn between the retail world and the food service industry. The issue of fraud does not crop up in the same way in both places.

Concerning retail sales, the distributors are really the ones who control the chain, the rules and labelling integrity.

With respect to food services, it's the Wild West, if I may say so. There are all sorts of practices, and it's very difficult to monitor everything. The committee recently heard from representatives of Oceana Canada, so I imagine that they told you about the results of their research, which I contributed to, by the way.

• (1200)

**Mrs. Caroline Desbiens:** Earlier, you spoke about rewarding best practices.

In your opinion, how should best practices be rewarded?

**Dr. Sylvain Charlebois:** That's a good question.

I was expecting the question, but I don't know if I have a good answer for you. Frankly, the tax burden on some companies is quite heavy. The government could look at that issue.

The advantages of certification could also be promoted. I'll give you an example. At the seafood counter of a grocery store, where products featured certification by MSC and the Ocean Wise Seafood program, I asked the employee behind the counter what that meant. He didn't know. There is seemingly a lack of information. I was the first customer in four years to ask that question. The certification programs are not explained to the general public.

Public awareness campaigns could help the market, in my opinion. They could explain what certification programs entail, and that could reassure consumers.

**Mrs. Caroline Desbiens:** I am sorry to interrupt you, but I see that I'm out of time.

[*English*]

**The Chair:** I'm sorry, Madam Desbiens, your time is up. Time goes fast when you're having fun.

We'll now go to Ms. Barron for two and a half minutes or less, please.

**Ms. Lisa Marie Barron:** Thank you, Chair.

I see that Mr. Zimmerman has some follow-up thoughts he is hoping to make. Maybe I'll ask somewhat of an open-ended question, and you can add to that if you'd like.

Mr. Zimmerman, I was hoping that you might be able to expand a little bit on the following. We spoke to Skipper Otto, for example, who had some really novel approaches to tracking products. I wonder if you have anything you want to share with the committee that you feel would be some solutions to traceability that would be important for us to hear about.

Thank you.

**Mr. Scott Zimmerman:** What I have to say about blockchain and all of these QR codes is that these are tough times. Yes, some of the larger suppliers can make those financial commitments to that technology, but, by and large, it's not going to happen overnight. There's a wide variety of RFID tags.

Here in the United States, we had a challenge with coming up with a low-tech traceability solution. There's a wide variety, like the Internet of things, tags, traceability codes and techniques, to go about tracing product through the chain of custody. I don't think those would be hard to find.

I was saying "no" about an issue that you guys brought up in mentioning government supporting third party certification. That's a very dangerous game to get involved in. I say that because I've seen facilities that have been audited under a third party get written up by the government for not having critical systems in place like HACCP programs. For them to be certified, where those food safety programs are a critical component of certification, to then get written up by the government for not even having that program is a major conflict. I thought I'd point that out.

• (1205)

**Ms. Lisa Marie Barron:** Thank you, Mr. Zimmerman, for clarifying that. It's good information for us to have as a committee.

To Dr. Charlebois—

**The Chair:** Thank you, Ms. Barron. You have about two seconds left, so you're not going to have time to ask a question or to get an answer.

**Ms. Lisa Marie Barron:** I can try.

Thank you.

**The Chair:** Everyone can try.

We'll now go to Mr. Zimmer for five minutes or less, please.

**Mr. Bob Zimmer (Prince George—Peace River—Northern Rockies, CPC):** Thank you, again, Chair.

Thank you to the witnesses for appearing today.

My first question is for Mr. Zimmerman.

I know the Fraser Valley up in Canada well. One thing that I've brought up before at the committee is the IUU fishing that happens. Often it's black-market fishing. The fish get traded for cash and cocaine. I'm just curious to know if you have similar examples in Florida where you have seen the IUU fishery directly involved with organized crime.

**Mr. Scott Zimmerman:** I think I heard something not long ago about the eel fishery in Maine being involved in some illegal practices. It's not a stretch of the imagination that anything with high

value—sea urchin, caviar, lobster—is used as a currency here in the United States.

**Mr. Bob Zimmer:** I'm not too familiar with your traceability standards other than what you've just explained. I guess I would just ask for your feedback on this. What would the impacts be on applying traceability to those same groups of food to somehow stem organized crime's involvement in those—in caviar and lobster, as you said? Do you think it would decrease the marketing in the black market?

**Mr. Scott Zimmerman:** At the end of the day, it's a matter of the competency of the people who are conducting those traceability audits of those systems. There's a very limited number of boots on the ground that can conduct that type of reconciliation, so they have to push their resources in one direction.

Most of the time it's a ready-to-eat product that's going to impact the safety of our population. Those products are higher risk, like the leafy greens and stuff that are getting written up for salmonella, E. coli or any pathogenic bacteria. The concern isn't the monetary value, but rather the value of the safety of our population.

**Mr. Bob Zimmer:** Okay, thank you.

I'll go on to Ms. Boivin.

You had some comments about traceability. I have some familiarity with this in agriculture and I've watched how effective it can be. We dealt with the term "organic". It's a term that gets slapped on stickers and put on everything, it seems, but now there is a standard. There had to be an agreed-upon standard of what "organic" actually means, and there are different levels of organic.

You talked about not wanting to have any added regulation or any added practices that add to costs, etc. If you think the standards are adequate, who actually comes and challenges you to prove that those standards are being met? Who comes in and looks over your shoulder to make sure that what you're saying is accurate?

[Translation]

**Mrs. Laura Boivin:** At Fumoir Grizzly, since the beginning of January, we have undergone four audits related to certification, including one for the SQF standard recognized by the Global Food Safety Initiative, or GFSI. This standard is required by most of our clients on the retail market.

[English]

**Mr. Bob Zimmer:** For us who don't know the acronyms, maybe you can explain what they mean, to the best of your ability anyway. Thank you.

[Translation]

**Mrs. Laura Boivin:** The GFSI organization brings together international standards such as BRC and SQF. Unfortunately, I don't know offhand what these abbreviations stand for, but I could provide you with the information later, if you wish.

The three certification audits that we have undergone since the beginning of the year are very costly for Fumoir Grizzly. In fact, for each certification, we must pay the person who comes on site and incur other related costs.

[English]

**Mr. Bob Zimmer:** Are these standards...? Are the ones who come to do the audit from Europe? Do they come over and do the checking, or is it oriented in Quebec? Can you say where they come from?

• (1210)

[Translation]

**Mrs. Laura Boivin:** Yes, the person who conducts certification audits for the GFSI organization is from Quebec. The independent auditors who are sent to us are third parties, often hired by the company NSF International, which is another abbreviation I can't spell out for you. NSF provides independent auditors to certification bodies, and these auditors review each of the certification or regulation criteria. In this case, SQF had 300 criteria, including labelling standards.

I will come back to one point. The organization responsible for verifying the information on the packaging of retail products is the Canadian Food Inspection Agency. It has a division that studies the information on our labels and on our packaging in particular.

[English]

**The Chair:** Thank you, Mr. Zimmer. You've gone way over.

We'll now go to Mr. Kelloway, for five minutes or less, please.

**Mr. Mike Kelloway (Cape Breton—Canso, Lib.):** Thank you, Mr. Chair. Hello to colleagues.

To the witnesses here, thank you for your testimony and, quite frankly, to all of the witnesses who have come here to date. It's been quite a learning experience to look at the strengths, weaknesses and gaps that we have in front of us.

I also want to thank Madame Desbiens for putting this study forward. I know that MP Morrissey looked at this in the previous Parliament as well. It's exceptionally important to Canadians.

My question is for Mr. Charlebois.

As I mentioned, many witnesses have testified about the need to act on and address seafood issues in Canada. You talked about it a bit here and some witnesses have as well, but I wonder if we can do a deeper dive on what other countries are doing with regard to this issue. I believe we can learn a lot from what they are doing with respect to traceability.

I'll start with Mr. Charlebois on this particular question. Do you know of any other countries that have implemented a successful boat-to-plate traceability program, and what systems, programs and mechanisms have these countries put in place to fight seafood fraud? Can we start there and maybe do a deeper dive on those countries and what they're doing? What has worked, what hasn't worked and what can we learn in clear terms?

**Dr. Sylvain Charlebois:** Absolutely.

We've had discussions with the Center for Food Integrity in the United Kingdom quite a bit. The one thing I've learned through the years is that they actually take food fraud seriously.

So far, the CFIA has received a budget of \$25 million over five years to look into food fraud. I have been working with the CFIA

for over 15 years. Early on, they never considered food fraud to be an important priority for the federal agency. Now it seems to be, but they can't really do much with \$25 million.

In the U.K. and in Europe in particular, we are seeing some movement around working with industry and awareness from consumers, generally speaking. I would say the boat-to-plate traceability system really boils down to what kind of certification program you're using in order to secure and reassure the public. I'm seeing a lot of education in the EU that comes from these agencies to the public. The public pressure is real.

During the pandemic, we saw five reports out of the EU looking at food fraud. In Canada, I have yet to see one.

**Mr. Mike Kelloway:** That's interesting, indeed.

When I used to teach at the University of Calgary in the continuing education program there, I would ask this on any given topic or on any given challenge. This builds on what you're saying here, but if we were to look at three things we need to do as a government today, Mr. Charlebois, what would they be?

It could be what you just mentioned and it's a chance for you to expand on it. I do like the idea of education and it speaks to a very integrated approach to getting the information out.

In terms of systems, communication and education, what are three things that, if we were to leave this room today, we could talk to our colleagues and the government about to ensure we push things in the right direction?

• (1215)

**Dr. Sylvain Charlebois:** Three things? I don't want to take too much time.

**Mr. Mike Kelloway:** I don't want to stop you at three. Three's great, but if you have four, go for four.

**Dr. Sylvain Charlebois:** One is that we need to know exactly the scope of the problem. We do not know in Canada. How big is the problem here?

The second thing I would do is design and create a safe place for industry and consumers to go to declare suspicious cases.

The third thing is to encourage compliance and reward compliance as much as possible.

Also, increase policing, I'm afraid. I hate to say this, but some companies out there are really damaging the reputation of the industry.

I would look at those four things.

**Mr. Mike Kelloway:** I have 19 seconds left.

This may have been brought up in previous testimony. Mr. Charlebois, how long did it take the EU to put the system in place that they have now? How long was the development of that plan and how long has it been in existence?

**Dr. Sylvain Charlebois:** It's been since 2013. The horse meat scandal they went through really raised a lot of eyebrows and policy changed almost overnight. Research on food fraud was well funded and new technologies came about. That's why Europe is a bit ahead of the game here.

I'm not suggesting that Canada needs a crisis, but I think we need to move before we do have a major crisis on our hands.

**Mr. Mike Kelloway:** Thank you very much. I appreciate it.

**The Chair:** Thank you, Mr. Kelloway.

We've completed two rounds of questioning, but we have motions to introduce and drafting instructions to do for the analyst. In order to get into that part of it, we need to recess for up to 10 minutes for the switchover to the in camera portion. Do we want to continue on or do we...?

**Mr. Rick Perkins:** Do we need to do the motions right now?

**The Chair:** Either way, it's going to take time for discussion and everything else. It has to go in camera for the motion and the drafting instructions.

**Mr. Rick Perkins:** I would prefer that the motions not be in camera.

I agree. If we want to end it now, that's fine.

**The Chair:** Mr. Hardie.

**Mr. Ken Hardie:** Mr. Chair, if we're able to consider my motion to add a meeting to this study, it would then relieve us of—

**The Chair:** We don't know if we can consider it yet or not, Mr. Hardie.

**Mr. Ken Hardie:** What I'm saying, Mr. Chair, is that it would relieve us of the need to do drafting instructions today if we're going to hear more—

**The Chair:** The motions are first.

What I'm asking is that should we end the questioning here to have time, just in case? I'll ask for permission from the committee.

Basically, this portion of our meeting is going to end here.

I want to thank all the witnesses who have appeared today. It's been a real education on something that I think most people don't pay much attention to. As we say in Newfoundland, we don't pay much heed to it.

In cutting it off here. I'm not trying to be contrary, as my mother would say. Mr. Small will know what I'm talking about, but I don't know if anybody else will understand it.

Again, thank you to everyone for your valued information today.

*[Proceedings continue in camera]*

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