



Recall Presentation May 2019



ECONOMIC IMPACTS

- Sofina Foods is one of Canada's largest poultry and pork processors, with **19 plants in Canada** (4 in Alberta, 3 in British Columbia, 10 in Ontario, and 2 in Saskatchewan).
- Our company **employs approximately 5,000 people** across the country and we are the fastest growing protein company in Canada.
- Sofina Foods offers a **complete line of branded, high quality products** which include the brands Janes, Cuddy, Lilydale, Fletchers, Vienna, Rio Mare, San Benedetto, Lavazza, San Danielle, Mastro and ZamZam.
- Sofina is one of Canada's larger private label producers for brands such as President's Choice, Ziggy's, Compliments and Selections
- Sofina Foods is a major supplier to the food service industry, providing high quality products to the likes of Subway, Sysco, Recipe's restaurant brands, GFS, Dairy Queen, etc.





BACKGROUND

- Sofina Foods is Canada's branded leader in battered and breaded, raw chicken products.
- We are **concerned with the focus that has been placed on recalling safe and regulatory-compliant products**, and with the interpretations of recall processes.
- These issues are of **critical importance** and are having a **significant impact on** our ability to provide high quality products to consumers and a viable workplace for our employees.



- Raw poultry has been shown to contain pathogens such as salmonella, a fact that CFIA and our trading partners are aware of and view as a natural occurrence.
 - Eg: For a sample set of 53 units of ground poultry:
 - Maximum number of accepted chicken positives: 26
 - ✓ Nearly 50% of the ground meat samples can be positive and will be accepted as satisfactory
 - Maximum number of accepted turkey positives: 29
 - ✓ This is over 50%
 - CFIA has confirmed that poultry will contain salmonella

(As per CFIA's Annex U (USDA Performance Standards for *Salmonella*) of the Import Country Requirements for the United States, Table U2.2.)





BACKGROUND

- None of these positives are required to be held or disposed of – they are allowed to go into commerce.
- If sample sets are found unsatisfactory (more than the allowable number of positives), the company is only required to complete the sample set again, up to a maximum of 3 times, without any action being taken on the positive product (i.e. all released to commerce).
- All of our raw materials are sourced from suppliers who meet USDA standards.





THE ISSUE

- Scientific evidence has shown that properly cooking chicken will destroy salmonella. Sofina has been subject to numerous, inappropriate recalls due to **consumer mishandling**.
- Salmonella is widely known to be present in raw chicken and as such consumers are consistently advised to thoroughly cook the product. **Recalls of Sofina products are not due to improper processing or product “contamination”**, but instead are a result of a small number of consumers not following the accurate cooking and handling instructions on the label.
- Sofina understands and encourages the **science-based approach** to decision making this Government has committed to. As you may be aware, **it is a scientific fact that raw battered and breaded chicken carries with it the risk of salmonella illness if it is improperly cooked and handled.** However, this does not render the product adulterated or unfit for human consumption under the Food and Drug Act.





ACTIONS TAKEN TO DATE

Labelling Enhancement:

- Enhancement of both outer carton and inner bag to assure that:
 - Consumers are fully aware that they are purchasing a raw product.
 - The storage, **cooking and handling instructions “pop”** clearly off the packaging.
- Inclusion of clear icons to assure we have communicated adequately to our younger customers and those with visual impediment.
- Inclusion of a clear, bright yellow **warning label**, declaring ***“this product is raw and will make you ill if not cooked thoroughly.”***





ACTIONS TAKEN TO DATE

Product and Plant Initiatives:

- The process and the plant have been intensively audited by CFIA, HC and BRC. In all cases, **NO FOOD SAFETY** deviations were found. This is a BRC AA rated plant.
- **Cooking instructions for all products have been validated independently** by the University of Guelph to assure that even at a 7 log load, all salmonella is destroyed. The cooking instructions were found to be **absolutely sufficient.**
- All suppliers of raw poultry, including US suppliers, were mandated to enhance their processes with the addition of PAA salmonella interventions. All suppliers were monitored routinely and a **proven reduction achieved.**





ACTIONS TAKEN TO DATE

Product and Plant Initiatives:

- Effective Nov 22, 2018, all meat inputs were pre-tested and only products with negative sp results used in the FBBCP.
- **Effective March 9, 2019, Sofina discontinued** all production of raw comminuted battered and breaded product.
- Moving forward all retail, comminuted product will be **fully cooked**.
- This **multi-million dollar investment** was implemented to meet Option 1 of the “Salmonella control options in frozen raw breaded chicken products” guidance found on the CFIA website.





GOVERNMENT ASKS

1. Sofina asks that **Government discontinue treating the meat processing industry differently from other industries, where the manufacturer is not considered liable for consumer mishandling.**
2. Sofina asks that there be **clear transparent sharing of data from PHAC to the processor prior to recall.** This would include the decision tree for the recall, testing results (WGS) and next steps. Sofina must be an active participant in decision-making and must be apprised of any developments in a timely manner.
3. Sofina asks that **raw, breaded product be cooked to specified instructions before testing, prior to making a recall decision.**
4. Sofina asks that **Agencies work to discontinue the practice of recalling products from the market which are deemed safe when cooked as per the instructions on the package and focus on educating the consumer.**





CLOSING COMMENTS

- **This issue is about consumer education not recall.** These recalls have not had a beneficial impact on the consumer other than to erode public trust in the food system, create confusion and distrust in the Janes brand and with regulators.
- **Sofina Foods supports the government's role in educating Canadians on the proper care and handling of raw poultry.** Sofina Foods has commenced a consumer education campaign over the last 2 months. Sofina Foods would support a coalition with Government and Industry to further educate Canadians.
- **Sofina Foods supports the use of recall measures when appropriate and scientifically supported.**
- **Salmonella is a naturally occurring pathogen found in raw poultry** and should not be a surprise to government agencies when detected (based on performance standards in Annex U, CFIA Website).
- **It is our position and ask that recalls of products that are deemed safe when cooked cease to occur** and be replaced by solid consumer education which would be of value both in this category and in any other raw product category.

