

# Agriculture and Rural Development, Health and Alberta Health Services — Provincial Food Safety Follow-up

## Notice to readers:

This report deals with the Department of Agriculture and Rural Development, the Department of Health and Alberta Health Services responsibilities for food safety in the province. In 2013 a review<sup>1</sup> was released about the beef recall that occurred at XL Foods Inc.’s plant at Brooks, Alberta, between September and October 2012. The federal government is responsible for inspecting this facility. Accordingly, the processes used to regulate this facility are outside the scope of our follow-up audit.

The following table is to assist the reader in distinguishing the responsibilities between federal and provincial jurisdiction in the inspection of meat facilities.

MEAT PACKAGING FACILITY DISTRIBUTES MEAT	JURISDICTION RESPONSIBLE FOR INSPECTION
Within Alberta	Provincial
Outside Alberta	Federal
Both within and outside Alberta	Federal

## SUMMARY

### History of the audit

In 2006, we made 10 recommendations relating to food safety in Alberta. We recommended that:<sup>2</sup>

- Alberta Health Services (AHS, formerly regional health authorities) improve its food inspection programs and issue permits in compliance with legislation
- AHS and the Department of Health<sup>3</sup> make wider use of tools to promote food safety and improve their information systems
- the Department of Agriculture and Rural Development administer its food safety surveillance program better, improve its inspection and investigation programs and improve its information systems
- the departments of Health and Agriculture and Rural Development develop better accountability for food safety
- Health, Agriculture and Rural Development and AHS improve their integrated food safety planning and eliminate gaps in food safety coverage in Alberta

In 2009, we followed up on our original audit. Two of the recommendations were implemented, leaving eight recommendations outstanding.

<sup>1</sup> Independent Review of XL Foods Inc. Beef Recall 2012, [http://www.foodsafety.gc.ca/english/xl\\_reprt-rapprte.asp#g](http://www.foodsafety.gc.ca/english/xl_reprt-rapprte.asp#g)

<sup>2</sup> *Annual Report of the Auditor General of Alberta: 2005–2006*, Volume 1, pages 63-107.

<sup>3</sup> For purposes of this report, the term Department of Health includes the former Department of Health and Wellness.

## What we examined

In this audit, we followed up on the eight outstanding recommendations relating to food safety programs at AHS, Health and Agriculture and Rural Development. We focused on how they monitor food safety practices for food production, what information systems they use, and how they cooperate with each other and report on their results.

## What we found

We have concluded that six more of the original ten recommendations have been implemented. AHS has improved its food establishment inspection programs and made them more uniform across the province. Cooperation between organizations and between federal–provincial regulators has improved. Agriculture and Rural Development has improved its surveillance and information system management processes.

## What needs to be done

Two recommendations remain outstanding:

- Health needs to develop a strategic plan to demonstrate the effectiveness of its food safety program in Alberta. As well, the two departments must integrate their strategies to ensure a coordinated and effective approach to food safety. The outcomes of the integrated strategies need to be reported to Albertans.
- AHS and Agriculture and Rural Development need to consistently apply the province's meat facility standards in their inspections of food establishments.

## Why this is important to Albertans

Food safety is essential to good public health. To trust that the food we eat is safe, Albertans need to know that good food safety systems are in place and working. These systems require sharing scientific knowledge and monitoring physical conditions at all stages of food production, from meat packing plants to restaurants. For this complex system to succeed, federal and provincial departments, AHS, and the departments of Health and Agriculture and Rural Development must all work well together.

# AUDIT OBJECTIVE AND SCOPE

## Our audit objectives

Our objective was to determine if Agriculture and Rural Development, Health and AHS had implemented the eight food safety recommendations remaining from our 2005–2006 report. We assessed management's action against the audit criteria we used in 2006.

## Audit scope

In performing this follow-up audit we:

- visited all five AHS zones and reviewed 240 food inspection files
- interviewed management and staff from AHS, Health and Agriculture and Rural Development
- reviewed numerous documents from all three organizations

We do not have the authority to audit the federal entities<sup>4</sup> that regulate aspects of food safety in Alberta. Nor did we contact them during our follow-up audit. As well, we did not audit food establishments that are regulated by federal statute. These include facilities that move their product inter-provincially or internationally. Most of the red meat processed in Alberta is federally inspected.

<sup>4</sup> The federal entities include Health Canada, its First Nation and Inuit Health Branch, and the Canadian Food Inspection Agency.

## BACKGROUND

Ensuring safe food involves regulation at all stages of food production, preparation and sale. Primary production includes producing and harvesting raw food. Secondary production extends to processing ready-to-eat products or preparing food with raw ingredients right before it is eaten.

Agriculture and Rural Development monitors and inspects production environments such as abattoirs (places for butchering animals) and meat processing facilities. It also does surveillance projects to identify risks that have a big effect on food safety, such as salmonella, listeria and other pathogens.

AHS is responsible for food safety at facilities that range from grocery stores to work camps to restaurants. To fulfill its responsibilities, AHS uses a reference tool it developed for its environmental health programs. Commonly called the Blue Book, it defines vision, mission, scope, principles and values for environmental health programs. It also divides environmental health into seven functional program areas, one of which is food safety. AHS uses the functional program areas from the Blue Book to organize its work relating to food safety.

Inspection programs use Blue Book standards to assign a risk level to food establishments based on the type of food handling they do. Establishments that serve ready-to-eat foods, such as convenience stores, are classified as class 1 and are inspected annually. Establishments with limited food handling of some raw ingredients, such as coffee shops, are classified as class 2 and are inspected twice a year. Establishments that prepare and serve food made from raw ingredients, such as restaurants, have the highest risk classification of class 3 and must be inspected three times a year.

Maintaining safe food systems in Alberta requires the participation of multiple governments and organizations. Health, AHS and Agriculture and Rural Development are members of federal–provincial–territorial committees that establish strategies for preventing and reacting to food borne illness.

## FINDINGS AND RECOMMENDATIONS

For each of the following eight recommendations from 2006, we have identified the entity directly responsible or the entities that share responsibility.

### Food establishment inspection programs—implemented

#### Alberta Health Services

##### Background

In 2006 we recommended<sup>5</sup> that Regional Health Authorities improve food establishment inspection programs by:

- inspecting food establishments following generally accepted risk assessment and inspection frequency standards
- ensuring that inspections are consistently administered and documented
- following up on critical violations promptly
- using enforcement powers to protect Albertans from the highest risk food establishments

<sup>5</sup> *Annual Report of the Auditor General of Alberta: 2005–2006, Volume 1, page 76.*

In 2009 we concluded that AHS had a risk assessment process for inspecting food establishments. We repeated the remaining three parts of the recommendation.<sup>6</sup>

AHS relies on food inspectors to protect human health. Its Blue Book classifies food establishments into one of three risk categories. The frequency of AHS's inspections of food establishments is determined by the risk category.

#### **Criteria: the standards for our audit**

Systems for food inspection programs should be designed, controlled and operated well. Standards for program delivery should be defined. Each entity involved with inspections should have enough employees with training and continued professional education.

Food safety programs should be consistent across the province. Throughout the province, facilities being inspected should receive equivalent treatment. Managers should monitor inspection results promptly. The extent and timeliness of inspections should be maintained. Managers in all five health zones should take appropriate action at each entity, based on the inspection.

#### **Our audit findings**

AHS has implemented this recommendation by improving its inspection frequency, administering consistent standards for inspections and using enforcement practices across the province.

AHS developed standard operating procedures that classify food establishments into one of three categories. Class 3 facilities require inspection every four months, class 2 every six months and class 1 annually. In our 2006 audit, the overall inspection completion rate was 56 per cent. In our 2009 follow-up audit, the inspection completion rate increased to 64 per cent. For the period ended March 31, 2013, for all three categories combined the overall inspection completion rate for the province was 91 per cent. We found no evidence to believe that this increase would not be sustainable.

AHS also developed a procedure to distinguish critical from non-critical violations of food safety regulations. Its procedure for responding to critical violations includes a time limit for the food establishment to fix the violation. AHS public health inspectors carry out inspections across Alberta and examine food establishments using the same standards.

Our testing and observation showed adequate documentation to demonstrate that when violations are noted they are either corrected during inspection (for example, by having the operator throw out spoiled food) or documented in an action plan, followed up and promptly resolved.

During our testing, we also noted enforcement tools such as executive orders and prosecutions being used. Executive orders are used to remedy a contravention of the *Public Health Act* or mitigate a public health nuisance. Most often, prosecutions are a Court of Queen's Bench Order to back up the executive order. AHS issued 227 executive orders and pursued 12 enforcement actions for the period ended March 31, 2013.

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<sup>6</sup> *Report of the Auditor General of Alberta—October 2009*, page 94.

## Tools to promote and enforce food safety—implemented Department of Health and Alberta Health Services

### Background

In 2006 we recommended the Department of Health and AHS consider a wider range of tools to promote and enforce food safety.<sup>7</sup>

In 2009 we observed that Health and AHS disclosed restaurant inspections on regional websites.<sup>8</sup> We observed that its Hazard Analysis Critical Control Point (HACCP) program required further work to implement.<sup>9</sup> We noted that Health and AHS were considering food safety training and education initiatives. We concluded they had made satisfactory progress but still needed to assess and implement innovative solutions to food safety issues.

### Criteria: the standards for our audit

Food safety regulators should have the legislative, regulatory and promotional tools needed to carry out their mandate. They should also consider innovative approaches to improve food safety and should follow consistent practices across the primary and secondary food processing industries and throughout the province.

### Our audit findings

Health and AHS developed food safety performance measures and created information system data definitions. These tools will improve the information they use to promote safe food. Both Health and AHS participate in the Canada–Alberta Partnership in Food Safety (CAPIFS). The committee meets to exchange information, identify food safety issues, and improve the coordination of food safety management and oversight in Alberta. We discuss this partnership in more detail later in this report (see page 61).

AHS also developed standard operating procedures. These complement the regulations under the *Public Health Act*. The procedures are guidelines for inspection processes, permits and discretion in enforcing food regulations. They do not replace Health's role to establish or seek amendments to existing regulations.

Results of restaurant inspections by AHS inspectors remain publicly available on the AHS website.<sup>10</sup>

AHS has developed and piloted a HACCP based program for restaurant operators across the province. The program was piloted at volunteer establishments, with a goal to introduce it to more operators in 2013. AHS also worked with Agriculture and Rural Development to develop a pilot strategy to implement HACCP based programs in meat processing facilities for which AHS provides permits. Both of these initiatives are intended to provide food handlers with better understanding of proper food safety systems. AHS believes that better understanding will also lead to improved compliance with food regulations.

In addition to training operators in HACCP, AHS offers regular food handling courses for food establishment staff throughout the province. Over 3,500 employees attended this course for the year ended March 31, 2013.

<sup>7</sup> *Annual Report of the Auditor General of Alberta: 2005–2006, Volume 1*, page 83.

<sup>8</sup> *Report of the Auditor General of Alberta—October 2009*, page 98.

<sup>9</sup> HACCP is a preventive approach to food safety. It focuses on inspecting physical, chemical and biological conditions of the facility rather than inspecting finished products. HACCP is intended to identify potential hazards so risks can be eliminated before they affect food safety. A reference manual on specific inspection processes can be found at [www.inspection.gc.ca](http://www.inspection.gc.ca).

<sup>10</sup> See <http://www.albertahealthservices.ca/707.asp> for restaurant inspection results across Alberta.

## Food safety information systems—implemented

### Alberta Health Services

#### Background

In 2006 we recommended that AHS, supported by the Department of Health, improve its automated food safety information systems.<sup>11</sup> This included:

- enhancing system management, security and access control
- ensuring data consistency
- ensuring that service level agreements are in place
- developing reporting capacity for management and accountability purposes

In 2009 we repeated the recommendation.<sup>12</sup> AHS regions used three different software packages to collect and store environmental health information (including food safety). All three packages supported food safety activities such as issuing permits, calculating risk for each establishment, recording inspections, scheduling re-inspections and reporting summary results. There was no common software package for the province as a whole. Health could not access the systems that AHS used and did not collect food safety data.

#### Criteria: the standards for our audit

Food safety information systems should be designed, controlled and operated well. Managers should define the data they need to plan, manage and report on their key businesses; the information systems should collect that data. Systems should be secure, including access, input and processing controls. Systems should collect and maintain timely, complete and accurate data.

#### Our audit findings

AHS has implemented this recommendation by working towards one software package to collect and store environmental health information across the province. This software is currently used in the South, Calgary and Central zones. AHS plans to introduce it in the Edmonton and North zones. Management has prepared a detailed report showing its business objectives, the resources required and timelines to implement the software.

AHS improved management, security and access controls for its information systems. Information stored on laptops is encrypted and there are reasonable sign-on and password controls to access the data.

AHS created a set of data definitions that inspectors use across the province. Its new standard operating procedures guide inspectors when performing inspections of food establishments. This guidance helps inspectors perform inspections and improves the quality and consistency of data.

AHS now reports to Health quarterly on five performance measures for food safety in each zone. These five performance measures include the number of inspection units with critical violations, percentage of inspections with critical violations, number of critical violations, number of people who take food safety training and number of orders issued. The quarterly reports provide Health with the information it needs to make informed business and regulatory decisions.

<sup>11</sup> *Annual Report of the Auditor General of Alberta: 2005–2006*, Volume 1, page 84.

<sup>12</sup> *Report of the Auditor General of Alberta—October 2009*, page 99.

## Agriculture surveillance program—implemented Department of Agriculture and Rural Development Background

In 2006 we recommended the Department of Agriculture and Rural Development improve the administration of its food surveillance program.<sup>13</sup> This included:

- involving partners in deciding which projects have priority
- capturing costs for large projects
- monitoring the impact of surveillance projects

In 2009 we concluded that Agriculture and Rural Development had made satisfactory progress but still needed to:<sup>14</sup>

- involve stakeholders and partners in identifying issues and setting priorities for surveillance
- implement systems to capture in-kind costs for specific surveillance projects
- extend its analysis of surveillance project results to determine whether its projects ultimately contributed to food safety outcomes

### Criteria: the standards for our audit

Agriculture and Rural Development should ensure that its process to select surveillance projects is working. There should be effective coordination between food safety partners to ensure that initiatives are properly prioritized. Surveillance programs should be operated with due consideration to effectiveness and efficiency. Managers should monitor results and take appropriate action based on program results.

### Our audit findings

Agriculture and Rural Development implemented this recommendation by consulting with other government departments and meeting with industry representatives. Its consultation with industry took place primarily through meeting with the Alberta Food Processing Association and attending food safety conferences.

Agriculture and Rural Development strategically identified the following surveillance projects as priorities. These five surveillance projects had either federal, provincial or industry participation:

- assessment of sanitation in provincially licensed abattoirs, in response to the listeriosis outbreak in 2008
- salmonella enteritidis surveillance, co-sponsored by the Chief Provincial Veterinarian and the Chief Medical Officer of Health
- adoption of chemical intervention strategies in provincially licensed abattoirs
- preliminary microbiological assessment of sanitation in provincial facilities participating in the interprovincial meat hygiene pilot
- provincial baseline survey for salmonella and campylobacter in broiler chicken—a federal–provincial–territorial initiative to reduce pathogens in poultry products

Depending on the outcomes from the surveillance projects, Agriculture and Rural Development used the information to become part of the food safety system by advising the public and industry or to enforce meat facility standards, for example.

Agriculture and Rural Development estimates project costs based on materials and the percentage of an employee's time allocated to that project. It tracks the actual cost of materials and disposable items for

<sup>13</sup> *Annual Report of the Auditor General of Alberta: 2005–2006*, Volume 1, page 88.

<sup>14</sup> *Report of the Auditor General of Alberta—October 2009*, page 101.

each project but, after conducting a cost–benefit analysis, has decided not to track individual hours. We agree with this decision.

The focus of Agriculture and Rural Development’s surveillance projects has shifted from numerous small projects (for example, studying the effectiveness of boot baths) to large projects examining the spread of disease and pathogens. This broader scope means that surveillance project results can provide a more significant input to program discussions.

### Agriculture food safety information system—implemented Department of Agriculture and Rural Development Background

In 2006 we recommended the Department of Agriculture and Rural Development improve its food safety information systems by:<sup>15</sup>

- improving its security and access controls
- ensuring complete, timely and consistent data collection
- ensuring data gets into the computerized database

In 2009 we concluded that the department had made satisfactory progress but still needed to:<sup>16</sup>

- improve search functionality and capture more data in Agridam<sup>17</sup>
- assess the risks to data stored in the Projects Reports Database<sup>18</sup> and restrict access to sensitive data
- add past surveillance projects to the AIMS<sup>19</sup> database

#### Criteria: the standards for our audit

Food safety information systems should be designed, controlled and operated well. Managers should define the data they need to plan, manage and report their key businesses; the information systems should collect that data. Systems should be secure, including access, input and processing controls. Systems should collect and maintain timely, complete and accurate data.

#### Our audit findings

Improvements were made to Agridam’s security and access controls and to the amount of data stored in the system. Agriculture and Rural Development has improved security and access to its food safety information system by implementing a standard operating procedure for network administration and user maintenance. One staff member manages all project requirements, including granting and deleting project access to individuals and groups.

Agriculture and Rural Development stores more information in Agridam including complete and timely data on inspection results of red meat processing facilities. The department sets out its data requirements in audit and compliance directives for meat facilities and in detailed audit checklists. Lab test results, status reports, budgets, human resource and communication plans are all consolidated on the same system and managed by individuals assigned to specific projects. In addition, the system stores information on dairy producers, fish licenses and any other inspection data. Changes were also made to improve the system’s search function.

<sup>15</sup> *Annual Report of the Auditor General of Alberta: 2005–2006*, Volume 1, page 94.

<sup>16</sup> *Report of the Auditor General of Alberta—October 2009*, page 105.

<sup>17</sup> Agridam is Regulatory Services Division’s food safety application that is used to track information related to meat inspections, investigations and licensing.

<sup>18</sup> Projects Reports Database is used by Food Safety Division to store project information from the approval process to reporting the outcomes.

<sup>19</sup> AIMS is an application used by the Food Safety Division to track samples and test results from across the province.



The department evaluates each project in the Project Reports database for data sensitivity. It uses this assessment to restrict access to employees who need it. Not all historical project data was transferred to AIMS. Division managers assessed the cost-benefit of transferring historical data onto its computer systems and transferred only data that was relevant to their current operations. Their assessment of historical data included the project's sampling method, values of its data, confidence managers have in the data and the source of the data. We agree with this risk-based approach to moving past projects in the current database.

### Accountability for food safety—recommendation repeated

#### Departments of Health and Agriculture and Rural Development

We make this recommendation for the third time because Health needs to develop a strategic plan to demonstrate the effectiveness of its food safety program in Alberta. As well, the two departments must integrate their strategies to ensure a coordinated and effective approach to food safety. The outcomes of the integrated strategies need to be reported to Albertans.

#### Background

This recommendation requires senior management to develop a strategic plan for food safety accountability and report the results.

In 2006 we recommended the departments of Health and Agriculture and Rural Development further develop their capacity for food safety accountability in Alberta.<sup>20</sup> This included ensuring the departments' information systems can produce the information their ministers need for individual ministerial accountability and for cross-ministry accountability. In 2009 we changed the recommendation to the departments of Health and Agriculture and Rural Development to improve reporting on food safety in Alberta.<sup>21</sup>

In our original audit, we discussed the issue of joint accountability in an environment of shared responsibility for food safety. The Government of Alberta had no system for joint accountability between the two departments covering the food continuum from the farm gate to the food on your plate.

#### **RECOMMENDATION 5: ACCOUNTABILITY FOR FOOD SAFETY—REPEATED**

We again recommend that the Departments of Agriculture and Rural Development and Health improve reporting on food safety in Alberta.

#### Criteria: the standards for our audit

The ministers of Health and Agriculture and Rural Development should be able to demonstrate their accountability for the integrated food safety program in Alberta. In addition, individual entities should be accountable for their specific food safety mandate. Each entity should contribute to integrated accountability by reporting on its operations (cost and outputs) and effectiveness (meeting objectives).

<sup>20</sup> *Annual Report of the Auditor General of Alberta: 2005–2006*, Volume 1, page 105.

<sup>21</sup> *Report of the Auditor General of Alberta—October 2009*, page 114.

## Our audit findings

### *Department of Agriculture and Rural Development*

In 2009 we noted that the department's reporting was the most comprehensive available about food safety in Alberta. This remains the case. The department's annual results analysis publicly reports on its role and responsibility for safe food. It reports on two performance measures: the percentage of licensed meat processing facilities that have added a preventive system to existing food safety systems and the number of facilities participating in the HACCP program.

The report also outlines other Agriculture and Rural Development initiatives, describing their objectives and cost. These programs include national and provincial food safety strategies, farm animal health and welfare, emergency preparedness, food safety systems, livestock traceability and provincial crop pest surveillance. We are satisfied with Agriculture and Rural Development's ability to produce the information for ministerial accountability.

### *Department of Health*

The Department of Health does not report about food safety in Alberta. It does not have a strategic plan with objectives and performance measures to demonstrate the effectiveness of its food safety program in Alberta.

### *Health and Agriculture and Rural Development—together*

In 2009 we commented that the next step for both departments was to agree on and approve a food safety strategy. The strategy would allow for integrated, cross-ministry accountability for food safety. The departments set up a deputy minister interagency food oversight committee in 2010. One of its agenda items was to develop a provincial food safety strategy. The deputy ministers delegated this task to their assistant deputy ministers, who were on a separate interagency food oversight committee. However, this has not moved forward and Alberta still does not have an integrated food safety strategy.

## Implications and risks if recommendation not implemented

Without a system to coordinate accountability for food safety, the ministries will not be able to demonstrate the effectiveness of their actions in an environment of shared responsibilities. Individual participants also need systems to demonstrate the effectiveness of their own food safety activities.

## Integrated food safety planning and activities—implemented

### Department of Health, Department of Agriculture and Rural Development, and Alberta Health Services

#### Background

This recommendation deals with the operational day-to-day activities of the department's ability to integrate their food safety planning and activities.

In 2006 we recommended that the Department of Health and the Department of Agriculture and Rural Development work with regional authorities and federal regulators to improve integrated food safety planning and cooperation on food safety activities.<sup>22</sup>

We repeated this recommendation in 2009, citing the need to complete strategic plans for environmental public health and food safety and to coordinate related activities.<sup>23</sup> We also repeated our recommendation that the departments resolve how they would use HACCP for all food processors.

#### Criteria: the standards for the audit

<sup>22</sup> *Annual Report of the Auditor General of Alberta: 2005–2006*, Volume 1, page 97.

<sup>23</sup> *Report of the Auditor General of Alberta—October 2009*, page 107.

Food safety relies on shared responsibility among all parties involved. Their efforts should be integrated and coordinated across ministries, departments and agencies, and throughout the province.

### Our audit findings

The Federal–Provincial–Territorial Food Safety committee has representation from the ministries of Agriculture and Rural Development and Health across Canada, including Alberta. The committee is working on strategic planning, non-federally registered sector<sup>24</sup> surveillance, pathogen reduction, dairy, food safety recognition and food retail.

The Canada–Alberta Partners in Food Safety (CAPIFS) is a joint initiative of the Canadian Food Inspection Agency, Health Canada, Department of Agriculture and Rural Development, Department Health and Wellness and Alberta Health Services. CAPIFS meets to exchange information, identify food safety issues, and improve coordination of food safety management and oversight in Alberta. They have revised their terms of reference and met regularly since October 2009.

CAPIFS has completed a number of initiatives on food policy integration and accountability. They include:

- a document describing legislation and regulations governing food in Alberta
- list of agencies with authority for food oversight
- list of food establishments
- list of agencies' role in each establishment

CAPIFS has recently revised Alberta's protocol for food borne illness and risk investigation. The protocol provides guidance for provincial and federal entities to act in cases of a food borne illness outbreak, exposure of the public to food borne biological, chemical or physical hazards, and recall of food products. The plan includes First Nations and Inuit Health and provincial lab facilities.

### Eliminating gaps in coverage—satisfactory progress

#### Department of Health, Department of Agriculture and Rural Development, and Alberta Health Services

##### Background

In 2006 we recommended that the Department of Health, Alberta Health Services and the Department of Agriculture and Rural Development work with federal regulators to eliminate the gaps in food safety coverage in Alberta.<sup>25</sup> Gaps included:

- mobile butchers with unsanitary premises
- inconsistencies in administering meat facility standards
- lack of coordination for inspections

We repeated this recommendation in 2009, to close all three gaps.<sup>26</sup>

Mobile butchers slaughter animals on an animal owner's premises. The meat is for the owner's use and cannot be sold. The mobile butcher eviscerates, skins and halves the animals on site. In many cases, the mobile butcher then takes the halves back to his own facility for further processing. Agriculture and Rural Development licenses the mobile butcher but historically AHS licensed the processing facility.

<sup>24</sup> A food establishment with a federal inspection covering certain categories such as packaging or labelling yet still required to be provincially inspected for its overall operations.

<sup>25</sup> *Annual Report of the Auditor General of Alberta: 2005–2006*, Volume 1, page 102.

<sup>26</sup> *Report of the Auditor General of Alberta— October 2009*, page 111.

Working together, Agriculture and Rural Development and Health set meat facility standards. The standards outline the requirements that meat processing facilities must meet. Historically, public health inspectors inspected all provincially regulated meat facilities. Starting in 2000, Agriculture and Rural Development's meat inspectors began to enforce the standard at meat facilities attached to provincially regulated slaughter facilities. Agriculture and Rural Development modified its version of the standard in 2009.

The following table outlines the department and relevant legislation that governs meat inspection of provincially regulated facilities within Alberta:

Event	Legislation	Department
Slaughter	<i>Meat Inspection Act</i>	Agriculture and Rural Development
Slaughter and meat processing	<i>Meat Inspection Act</i>	Agriculture and Rural Development
Meat processing	<i>Public Health Act</i>	Alberta Health Services

#### Criteria: the standards for our audit

Agriculture and Rural Development, Health and AHS, together with other food safety regulators, should identify overlaps and gaps in their food safety activities. Higher risk food establishments that operate in the void left by overlaps or gaps should be identified and prompt action taken.

#### Our audit findings

As we completed our 2009 follow-up audit, the details were being finalized to transfer inspection responsibilities for mobile butchers from AHS to Agriculture and Rural Development. This transfer is now complete. Agriculture and Rural Development now inspects both trucks and meat processing facilities of mobile operators. Its goal is to inspect each operator annually.

We reviewed inspection reports for 23 mobile butchers' facilities. Facilities that had not fixed their non-compliance by an expected completion date met with inspectors to explain their continued non-compliance. A single extension to the timeline was often granted. Once the extended date was reached, if the facility was still non-compliant the department took action to temporarily shut down some or all of the plant's operations. One facility was closed under this practice in 2011. We reviewed all 23 mobile butcher inspection reports and found processes in place to monitor deficiencies and enforce compliance.

We found discussions at CAPIFS were an effective process in identifying possible food establishments that are non-federally registered. The partners held discussions about the different food establishments to ensure that there was agreement as to who was responsible for inspecting it. In one example a cheese producer indicated to the provincial inspector that the facility was being inspected by federal inspectors. Communication between the two levels of government showed this was not the case. The facility was then properly inspected.

There continues to be a gap in the use of the meat facility standards between Agriculture and Rural Development and AHS. The meat facility standards are part of the regulations for Alberta's *Meat Inspection Act*. Meat facilities inspected by Agriculture and Rural Development must adhere to the Act, the regulations and the standards. Conversely, AHS's authority to inspect food establishments is governed by the *Public Health Act*, food regulations, and food retail and food services code. The meat

facility standards are listed in the code. Although the inspection processes are different, the intended and actual outcomes, safe food, are equivalent.

This discrepancy was also outlined in a report to Agriculture and Rural Development in 2012.<sup>27</sup> Agriculture and Rural Development commissioned this report because the industry had raised concerns about inconsistencies between the department's and AHS's inspections of meat processing facilities.<sup>28</sup> We have not reviewed the report in depth, but note that the report recommended "that the Department of Agriculture and Rural Development work with the Department of Health and Wellness to harmonize Meat Facility Standard and Food Code. We also recommend that the department[s] work together to harmonize inspection activity."<sup>29</sup> Agriculture and Rural Development stated to the Standing Committee of Alberta's Economic Future that it is taking each of the recommendations seriously.<sup>30</sup>

### **What needs to be done**

AHS and Agriculture and Rural Development need to consistently apply the province's meat facility standards in their inspections of food establishments.

### **Implications and risks if recommendation not implemented**

If standards are not consistently applied between the Department of Agriculture and Rural Development, the Department of Health and Alberta Health Services, those being regulated may perceive that they did not get equivalent treatment or actually did not get equivalent treatment.

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<sup>27</sup> [http://www1.agric.gov.ab.ca/\\$Department/deptdocs.nsf/all/afs14398/\\$FILE/cuffmib-mar2013.pdf](http://www1.agric.gov.ab.ca/$Department/deptdocs.nsf/all/afs14398/$FILE/cuffmib-mar2013.pdf)

<sup>28</sup> <http://www.edmontonjournal.com/tape+strangling+small+meat+packers+critic+says/8337884/story.html>

<sup>29</sup> 2012, George B. Cuff & Associates Ltd., *A Report on the Alberta Meat Inspection Program*, page 74.

<sup>30</sup> <http://www.assembly.ab.ca/Documents/isysquery/b7537f5e-6ca4-4f93-86b1-680817dd7f46/1/doc/>

