May 31, 2006

The Honourable Chuck Strahl, M.P.
Minister, Agriculture and Agri-Food Canada
Sir John Carling Building
930 Carling Avenue
Ottawa, Ontario
K1A 0C5

Minister:

I am writing on behalf of the Can-Trace Steering Committee to express appreciation for the ongoing support provided by Agriculture and Agri-Food Canada towards Can-Trace and the development of a national whole-chain traceability data standard. Can-Trace represents a comprehensive approach to traceability for all agri-food commodities and products throughout the value chain.

We note with interest your announcement of March 20, 2006 to begin consultations on a “National Agriculture and Agri-Food Traceability System beginning with livestock.” The efforts which Can-Trace has undertaken to date, and specifically the development of the Canadian Food Traceability Data Standard (CFTDS), v 2.0, would be useful to those agri-food businesses and sectors that are looking to provide assurances to buyers and consumers (both domestic and foreign) that “quality is in our nature”. It is important that you not lose sight of this achievement during your consultations with various groups in the agri-food sector in general and the livestock sector in particular.

Can-Trace began its work in 2003 with the objective of developing a voluntary, whole-chain standard identifying the minimum information or data elements essential to establish traceability. The work has been done collaboratively with industry representatives from many commodity groups and all parts of the food supply chain as well as observers from federal and provincial governments. The task of producing this standard, known as the Canadian Food Traceability Data Standard, version 2.0, is now complete. A copy is attached for your perusal.

Over the past three years, Can-Trace has worked collaboratively to produce other materials intended to provide information and guidance to those stakeholders interested in traceability. Examples of this work include:

- Pilot studies of simulated food recalls in beef, pork and produce which examined an earlier version of the standard to test its relevance and validity in the market;
- A Small and Medium sized Enterprise (SME’s) Report which addresses challenges particular to smaller businesses;
• A Technology Guidelines Report which looks at some best practices for capturing and transmitting information between partners and the capabilities of various technologies for doing so;
• A Multi Ingredient Products report which examined the question of whether Can-Trace was applicable to these more complex products;
• An Integration Guidelines Report which examined the extent to which Can-Trace in its current or amended form could accommodate the traceability requirements in a number of on and off farm producer-related programs;
• A Business Case report and Decision Support Tool to assist businesses to undertake a cost-benefit analysis of traceability in their own organizations.

By late June, all of these recently completed reports will be available on the Can-Trace web site in both official languages.

The development of a whole-chain standard that can be used seamlessly from producer to retail/food service therefore represents a significant accomplishment. The standard is based on a one up/one down model for moving traceability information, which means each partner in the supply chain has a responsibility to collect, keep and share data with the preceding and subsequent partner in the chain. The CFTDS, in effect, provides a whole chain “safety net” for traceability information. What is also important to note that this “made in Canada” standard is aligned with the recently established global GS1 Traceability Standard, which carefully considered Can-Trace.

Can-Trace’s current challenge is to communicate the results of our work to interested stakeholders in the supply chain. In addition, as part of our commitment to provide tools and information to assist groups and businesses in the agri-food supply chain, we propose in our next phase of work to develop an “Implementation Guideline Template” to assist those sectors which have a more immediate business need to move forward and undertake the substantial investment that may be required to implement Can-Trace. While Can-Trace itself is not mandated to advocate the implementation of traceability, the evidence suggests that a number of sectors have already assumed a leadership role with respect to traceability using Can-Trace as the basis for their action. For example:

• The Canadian Produce Marketing Association, in tandem with its U.S. counterpart, the Produce Marketing Association, has created implementation guidelines for its membership which incorporate much of the information from the Can-Trace work including the data standard;
• The Canadian Aquaculture Industry Alliance has incorporated the Can Trace data standard in its National Code System for Responsible Aquaculture;

Finally, Minister, I want to re-iterate that the Can-Trace initiative represents a tremendous amount of work accomplished by representatives from industry working together with the support and involvement of Agriculture and Agri-Food Canada. The initiative represents a truly unique achievement and has positioned Canada in a leadership position with respect to traceability on the global stage. We currently have an application in for continued funding under the Canadian Food Quality and Safety Program, and are hopeful that we will be able to
continue to work with you and your department to ensure that Canada remains in a leadership position on traceability.

Yours truly,

David Rideout
Chair, Can-Trace
Executive Director, Canadian Aquaculture Industry Alliance

c.c. Dan Lutz, AAFC;
     Tom Feltmate, CFIA;
     Laura Anderson, Canadian Grain Commission;
     Can-Trace Steering Committee