

MIDDLESEX-LONDON BOARD OF HEALTH

REPORT NO. 29-24

TO: Chair and Members of the Board of Health
FROM: Dr. Alexander Summers, Medical Officer of Health
Emily Williams, Chief Executive Officer
DATE: 2024 April 18

THE EVOLVING FOOD SAFETY LANDSCAPE

Recommendation

It is recommended that the Board of Health receive Report No. 29-24 re: “The Evolving Food Safety Landscape” for information.

Report Highlights

- This report provides an update on [Report No. 64-22](#) that the Board of Health received on November 10, 2022 regarding the changing landscape for food safety in Middlesex-London.
- Recent trends, including special events, manufactured products, and shared / rented kitchens, present unique scenarios for Public Health Inspectors to understand and inspect.
- These trends are continuously risk-assessed and monitored to ensure the appropriate public health response is taken to protect the Middlesex-London community from harms associated with food-borne illness.

Background

The food safety program assists in the prevention and reduction of food-borne illnesses through the delivery of local, comprehensive food safety programs. As part of the program, the Food Safety and Health Hazards (FSHH) and Infectious Disease Control (IDC) Teams are responsible for monitoring emerging trends related to food safety. Increasingly, Middlesex London Health Unit (MLHU) Public Health Inspectors have observed changing trends, such as more frequent special events, manufactured products, shared kitchen spaces, and home-based businesses. The novelty associated with these trends requires planning and consultation to adequately provide risk-based and meaningful interventions to mitigate food-borne illnesses. The work associated with understanding these emerging trends, investigating, and inspecting the new premises places pressure on traditional food safety inspection work.

To monitor enteric illness in the Middlesex-London region, the MLHU continues to participate in the Public Health Agency of Canada (PHAC) program, FoodNet Canada, as one of three

sentinel FoodNet Canada sites across Canada. The initiative examines trends in enteric illness and public health impact. FNC considers enteric illnesses from a unique perspective by integrating enhanced follow-up of human cases of selected enteric diseases, testing of retail food products of interest, sampling of manure from local farms and collection of surface water for pathogens that can cause illnesses. A memorandum of understanding along with the funding for this program has been confirmed through 2027.

Food Safety Emerging Trends

There has been a steady increase in the number of special events in Middlesex-London. These events include many 'first-time' operators. Public Health Inspectors have observed a lack of operator familiarity with regulatory requirements along with the need to provide increased education to equity deserving populations. The Health Unit has a requirement for operators to submit a notice of operation. Often these are either not submitted or submitted at the last minute making it challenging for the inspectors to provide early consultation and complete a proper risk assessment.

Facilities, such as restaurants, inspected by the MLHU produce manufactured food products. The MLHU's inspections are largely focused on safe food handling and sanitation related to these 'food service' facilities. However, there is an increase in operators producing food products for retail that require a knowledge of food processing and packaging. These products are being distributed through online sales, farmers markets, special events and smaller retail outlets. Food processing and manufacturing falls under the Canadian Food Inspection Agency (CFIA) or the Ontario Ministry of Agriculture and Rural Affairs (OMAFRA). However, due to either scope of distribution, type of food and / or location of preparation, these smaller venues are not supported/inspected by these agencies.

The popularity of renting kitchen spaces is an emerging trend that is presenting additional challenges. Operators require an inspected kitchen in order to manufacture food products or produce food for take-out or retail. Considerations for inspection work are significant and include food storage on-site (delineation of businesses) and responsibility for matters of regulatory compliance, along with logistical challenges related to hours of operation, file management, disclosure, and reporting of inspection results.

Current provincial regulatory exemptions introduced in 2020 permit operators to prepare low-risk foods from home and require annual risk assessment and inspection work. The City of London does not permit home-based food businesses due to zoning restrictions. However, discussions are underway to potentially align with provincial direction. There are several home-based businesses in Middlesex County, as municipal bylaws provide these allowances.

Next Steps

The Food Safety & Health Hazards and Infectious Disease Control teams have consulted with partner agencies and other health units, as well as the food industry, in order to better understand this new landscape. Oftentimes, emerging trends are identified through field inspection work which precedes the availability of Ministry direction. Without Ministry direction, there is an environment of uncertainty for the Public Health Inspectors. The MLHU continues to navigate these new emerging trends through ongoing consultations, risk assessments, and prioritization of interventions with the goal to prevent and reduce food-borne illnesses.

This report was co-written by the Managers of Food Safety & Health Hazards and Infectious Disease Control.



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This report refers to the following principle(s) set out in Policy G-490, Appendix A:

- The Food Safety Program Standard as outlined in the *Ontario Public Health Standards: Requirements for Programs, Services and Accountability*.
- The *Health Protection and Promotion Act, R.S.O. 1990, c.H.7* and *O. Reg. 493/17 Food Premises*.
- The following goal or direction from the Middlesex-London Health Unit's Strategic Plan:
 - Facilitate meaningful and trusting relationships with prioritized equity-deserving groups, specifically Black and Indigenous communities
 - Define what we do and do it well

This topic has been reviewed to be in alignment with goals under the Middlesex-London Health Unit's Anti-Black Racism Plan and Taking Action for Reconciliation, specifically recommendation:

- 21. Create and strengthen relationships and partnerships with ACB organizations, including the diverse faith institutions within the ACB community, in London and Middlesex County, to collaboratively enhance population health outcomes.