

C R – F A I R

Capital Region Food and Agriculture Initiatives Roundtable *Bringing about positive change in the food and agriculture system in the Capital Region*

9 March 2004

Honourable Colin Hansen
Minister of Health Services

Honourable John van Dongen
Minister of Agriculture, Food & Fisheries

Dear Sirs,

RE: Meat inspection regulation process

We are writing again on behalf of our Islands meat producers and processors. As well as our concerns expressed January 30 regarding the content and possible impacts of the meat inspection regulation, we have ongoing concerns about the process for its development.

It has come to our attention that many small-scale meat processors around BC – for a number of reasons – did not have an opportunity to comment on the consultation draft of the regulation. Our Islands colleagues only gained access to the February 2 stakeholder meeting in Richmond at the last minute. Although they and we have been impressed by the thorough and considerate way the Ministry of Health staff and consultants in that meeting listened to their input, they did not come away reassured.

They disagree with the rationale for the regulation as articulated by Mr. Copeland. They strongly believe that the regulation as originally drafted will have an effect opposite to what is intended. Evidence from the EU and UK shows that centralization and streamlining of processing has in fact contributed to proliferation and spread of food-borne disease. On the other hand, the more diversified and decentralized the infrastructure, the more resilient the food system is in the face of an accidental or deliberate threat.

Our Islands meat producers and processors are committed to maintaining food safety and consumer confidence in BC meat products. Their issue is not about whether or not *in principle* there should be rules for meat inspection. Their issue is about how those rules will work *in practice* in regional, specialty product (e.g. Certified Organic) and small-scale contexts.

We understand that you will shortly be considering recommendations from your staff and the results of an enterprise risk assessment of the regulation. An enterprise risk assessment sounds like a good idea. Certainly many farm and food enterprises seem to be at risk from the first draft of the regulation. What are the criteria for the assessment? How is it applied?

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In the light of these questions and our ongoing concerns, and because many stakeholders have not yet had an opportunity to comment, we request that you make the next draft of the regulation available for public review and comment, circulating it by Canada Post to all the stakeholders that have been identified to date, with at least six weeks' window for comment, BEFORE it goes for final Cabinet approval.

This regulation will have a significant impact on farm, processor, food, hospitality and tourism businesses, as well as on consumers, in communities all over the province. It will be in the interests of all parties to work through a couple of drafts now to facilitate the implementation process.

Thank you for your consideration of our request.

Yours very truly,

FOR THE CR-FAIR STEERING COMMITTEE

Kathleen Gibson

Members of the CR-FAIR Steering Committee

BC Government Employees' Union
Community Social Planning Council of Greater Victoria
GroundWorks Learning Centre
Growing Green Project
Island Farmers' Alliance
LifeCycles Project Society
Ministry of Agriculture, Food and Fisheries
Small Scale Food Processor Association
TLC The Land Conservancy
Vancouver Island Health Authority

c.c.

Kersteen Johnston, Ministry of Health Services
Daphne Stancil, Ministry of Agriculture, Food & Fisheries
Perry Kendall, Provincial Health Officer
Richard Stanwick, Medical Health Officer, VIHA

BC Food Systems Network
Certified Organic Associations of BC
Community Nutritionists Council of BC
District A Farmers' Institutes
FarmFolk/CityFolk
Lower Mainland Food Coalition
Peninsula Agriculture Commission
Slow Food Vancouver Island
Small-Scale Food Processor Association