

MEMO

TO: BC Food Systems Network
Certified Organic Associations of BC
Island Farmers' Alliance
District A Farmers' Institutes
Peninsula Agriculture Commission
Small Scale Food Processor Association
Food Security Standing Committee of the Council of Nutritionists of BC
FarmFolk/CityFolk Society
Lower Mainland Food Coalition
Slow Food Vancouver Island

FROM: Kathleen Gibson Growing Green/CR-FAIR

DATE: March 2004

RE: Meat inspection regulation content and process

Greetings.

Your attention and action is requested **this week** regarding the meat inspection regulation.

The regulation has critical implications for agri-food infrastructure (meat processors and abattoirs) and thus for food security around BC.

The consultation process to date has not been adequate.

Letters are needed **this week** to Ministers and staff.

To help you with the letters, a kit is attached:

- * backgrounder with recommendations for action
- * possible messages for the Ministers
- * summary of recommendations from the Island Farmers' Alliance Meat Inspection Committee
- * CR-FAIR's January letter to the Ministers

Best source for more information: www.bcfarmnet.org.

Cheers

Kathleen Gibson
Growing Green Project

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Backgrounder and recommendations for action Regarding meat inspection regulation

The regulation and the process

You will recall that a new meat inspection regulation was put forward by the Ministers of Health and Agriculture last year and that the deadline for comment was January 31, 2004. I have attached FYI (most but not all of you have already seen it) a letter submitted by CR-FAIR to the Ministers before the deadline.

On February 2 there was a stakeholder consultation meeting in Richmond. Several Islands-based small-scale meat producers and processors attended the meeting to voice their concerns about the proposed regulation, including:

- flawed rationale - should be based on increasing food safety and consumer confidence in BC's meat products
- measures that will put small local meat processors out of business, with detriment to local economies and food security
- inadequate process for consultation - key stakeholders out of the loop - and probably no further opportunity for input

Their concerns are effectively summarized in the paper A Critical Analysis of the Meat Inspection Issue in British Columbia which can be found on the www.bcfarmnet.org Web site under Meat Inspection. The summary is attached here for your convenience.

Also on the Web site is a report prepared by Ron Duffell in the Ministry of Health called Health Ministry Workshop on the Regulations which summarizes the concerns raised prior to the Feb 2 meeting. Minutes of the Feb 2 meeting are not yet posted.

Staff in the Ministries of Health and Agriculture are currently going through the hundreds of communications received to date. The Ministry of Finance has been asked to do an "enterprise risk assessment" of the regulation as proposed.

Staff will summarize the input received and the results of the risk assessment and will prepare a briefing report for delivery to the Ministers **by the end of this week (Mar 12)**. The report will provide policy options and recommendations and will include an implementation plan. The implementation plan may well include phasing in parts of the regulation over several years with opportunities for consultation and feedback as parts of it are tried out.

After the briefing the Ministers will provide direction regarding the next steps. I think it is more likely at this point that there will **not** be another opportunity for public comment before the regulation is enacted. It was assumed in January that the consultations up to and including Feb 2 would be all there was.

What you/your organization can do

Do a bit of homework, e.g., visit the bcfarmnet Web site. Then:

Task 1 – focused requests to staff re detail in the regulation

Send very focused, constructive if possible, comments - or new concerns - **before Mar 12** - to the staff compiling the briefing report, cc to the Ministers. Staff contacts:

Kersteen Johnston
Executive Director of Health Protection Planning
Ministry of Health Services
Tel (250) 952-1433
Email kersteen.johnston@gems5.gov.bc.ca

Daphne Stancil
Executive Director of Policy and Legislation Services
Ministry of Agriculture, Food and Fisheries
Tel (250) 356-1815
Email daphne.stancil@gems6.gov.bc.ca

They each have several people working on this and they get so much email that it's a good idea to phone and say you've sent an email, so their staff go look for it.

For example you could ask for:

- Special exemptions for on-farm slaughter, e.g. for Certified Organic
- Opportunity to comment on the final proposed regulation

Task 2 – specific request to Ministers re approach

Write to the Ministers **before Mar 12** with cc to Kersteen Johnston and Daphne Stancil requesting that when the next/final draft of the regulation is prepared, they make it available for public review and comment, circulating it by Canada Post to all the stakeholders that have been identified and have come forward to date, with at least six weeks' window for comment, BEFORE it goes for final approval. This request is because the potential for impact on BC farm and food businesses is so large and because many stakeholders were not able to participate in the first round of consultations

Please include in letter other thoughts regarding the regulation from your perspective – feel free to quote from the attached list of messages.

Honourable John Van Dongen
Minister of Agriculture, Food and Fisheries
Parliament Buildings
P.O. Box 9058, Stn PROV GOVT
Victoria, BC V8W 9E2
Tel (250) 387-1023
Email John.vanDongen@gems4.gov.bc.ca

Honourable Colin Hansen
Minister of Health Services
Parliament Buildings
P.O. Box 9050, Stn PROV GOVT
Victoria, BC V8W 9E2
Tel (250) 953-3547
Email colin.hansen.mla@leg.bc.ca

**Possible elements of letter to Ministers
requesting further public review/comment
regarding meat inspection regulation**

*For the want of affordable meat inspection, the processor was lost.
For the want of a processor, the farm was lost.
For the want of a farm, the restaurant, the store and the school were lost.
For the want of the restaurant, the store and the school, the community was lost.
And all for the want of affordable meat inspection.*

The more diversified and decentralized the infrastructure, the more resilient the food system is to a bug, or a bomb – an accidental or deliberate threat.

The regulation as written will have an effect opposite to that intended. Evidence from the EU and UK shows that centralization and streamlining of processing has in fact contributed to proliferation and spread of disease due to extended travel and stress for animals prior to slaughter.

About 60% of all processing plants in BC are small “uninspected” family operations. At this scale, personal attention to the animals and direct relationships with customers are viable, as safeguards. The larger the plant and the faster the kill line runs, the greater the challenge to ensure that meat is not contaminated.

On-farm slaughter of Certified Organic meat animals should be exempted from the regulation. Certified Organic already includes standards for animal welfare, environmental protection, and traceability.

Residents of food-secure communities have universal access to food that is healthy, nutritious, safe, and culturally acceptable. Community food security includes viable farm and food businesses.

Locally owned farm and food businesses are essential for communities’ economic health and people’s personal health.

Processors, whose businesses benefit farmers and consumers, are a critical link in food systems. In the three years since Vancouver Island lost its poultry processing facility, it lost 2/3 of its commercial chicken producers.

One farm job can lead to 10 jobs in food related industries.

Many successful and expanding food and beverage tourism businesses around BC – including world-renowned restaurants – rely on fresh seasonal local foods, especially meats.

Food consumed as close as possible to where it is produced is fresher, more nutritious, and less of a burden on the environment (less “food miles:” transportation-related pollution).

From

A Critical Analysis of the Meat Inspection Issue in British Columbia

Prepared by Lyle Young of Cowichan Bay Farm
For the Island Farmers' Alliance Meat Inspection Committee
February 8, 2004

The full document may be found under Meat Inspection on www.bcfarmnet.org

SUMMARY OF RECOMMENDATIONS

Small-scale abattoir operators are interested in continually improving consumer confidence and food safety in BC.

In order to achieve this small scale abattoirs *must remain viable*. In order to remain viable the scale of the operation must be recognized through *restricted size processing licenses*¹.

For small scale abattoirs to remain viable, new facilities requirements for restricted size processing licenses must take into account²

- The volume and frequency of use of the abattoir
- The track record of food safety in the abattoir
- The financial capabilities of the small scale abattoir

And for small scale abattoirs to remain viable, the abattoirs operating under a restricted size processing license must have different fully funded inspection options³. These include;

- CFIA inspector
- Certified private inspection contractor⁴
- HACCP based self inspection system⁵

Further to this, minimum plant size exclusions must be omitted from the draft legislation⁶, and game cutting must be exempt from the draft regulations as it forms an important part of the business of many small scale abattoirs⁷ and the game product is for personal consumption only (not for sale).

We look forward to working with the Ministry of Health Planning on the further development of this draft legislation, in order that it best have the potential to

Increase food safety and consumer confidence in BC's meat products

¹ Opportunity exists for this in the Food Safety Act section 23, (4) (a) and 23 (2) (j).

² Opportunity exists for this in the Food Safety Act, section 23 (2) (d).

³ Opportunity exists for this in the Food Safety Act, section 8 (1) and (2)

⁴ Opportunity exists for this in the Food Safety Act, section 23, (2) (p).

⁵ Upon consulting a food safety auditor we have been told that a HACCP based self inspection system need not be either costly nor onerous, contrary to the opinion of the inspected processor at the stakeholders workshop in Richmond, Feb '04.

⁶ As indicated in the Food Safety Act, section 23 (r) (i).

⁷ Opportunity exists for this in the Food safety Act, section 23 (2) (y)