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BC's New Meat Regulation - A Survey of Stakeholders.

by Jordan Marr

Identification of the Problem

The basic details of the new regulations as they relate to the slaughter process are as follows: in 2004, the BC Ministries of Health and Agriculture passed legislation that standardized meat production regulations in the province. Before that, rules governing the slaughter and subsequent sale of meat for human consumption varied according to region and/or type of transaction. Thus, all meat sold within the four most densely populated regions of the province—the lower mainland, greater Victoria, the South Peace, and the Okanogan regions—had to be slaughtered in a provincial or federally licensed facility. The same rules applied to all meat sold in any BC retail outlet. In other, less populated regions, however, producers slaughtering meat for sale at their own farm gates were subject only to municipal health regulations; thus, many of these producers were not required to possess a license or have an inspector present for the slaughter process.

The differences are confusing, but for the purposes of this article can be simplified as such. Before the new legislation, a beef producer in Abbotsford was required to possess a provincial or federal license in order to slaughter and sell meat for human consumption, regardless of the type of transaction. In Williams Lake, a beef producer could slaughter outside of a certified facility, but only if he or she was selling that meat at the farm gate. Seemingly, these differences existed to reflect the specific challenges faced by producers in more remote areas, such as the lack of an economically feasible way to transport their animals for certified slaughter.

Under the new legislation, all animals killed for human consumption in BC must be slaughtered in a provincial or federally licensed facility, in the presence of a certified meat inspector. This has many small producers worried, since they will face two undesirable choices. Either they can ship their animals to be slaughtered and processed—often over long distances and at a much greater cost—or build their own certified facility. For many, both options are too expensive. Thus, many producers fear they will have to close down their operations. As I will later discuss, some already have.

As a result, many of these producers, along with some loyal customers and sympathetic citizens, have called the regulations impractical and unnecessary. Our health authorities maintain, however, that the regulations are a necessary response to recent outbreaks of Avian Influenza, Mad Cow Disease, and E. coli, and the resultant lowered consumer confidence in BC's meat supply they have created. The government also argues that the measures they have introduced to help producers transition to the new rules will eliminate the concerns of the legislation's critics. Clearly, then, there is a difference of opinion about the need for these new regulations, and if there is a need, whether they will impede current producers' ability to stay in business.

The consequences of the new regulations are serious because, while their overall contribution to BC's meat supply may be comparatively small, there are thousands of small-scale beef, poultry, pork, and specialty meat operations in BC. As an example, Former BC Agriculture Minister Corky Evans, the current MLA for Nelson-Creston, estimates that unlicensed farm-gate sales represent 2000 cattle in his valley alone, to say nothing of poultry and other animals being raised. Thus, if it is true that these new regulations will take away or even restrict small-scale farmers' ability to produce for slaughter and sale, then this legislation represents a threat to a well-established alternative to buying retail meat in BC; one that embodies the idea of a localized, face-to-face food system that many people endorse.

Below are my findings, which consist mainly of interviews with producers, consumers, and relevant politicians and bureaucrats. I begin with what I feel is the most important question of this issue: whether a change to the old regulations was needed at all. Next, making the hypothetical assumption that a change was needed, I discuss whether the new regulations represent the best response to that need. I conclude with a discussion of the various factors that affected the legislation, and some possibilities for the future.

Before I continue, however, I should point to a couple of limitations of this article: first, most of my research is anecdotal, as I have relied mostly on personal interviews (twenty-five of them) with various people. Second, I have left the definition of ‘small-scale producer’ rather ambiguous, mainly because it is not easy to find a consensus on what constitutes a small-scale farm. For this article, I do not think a specific definition is as important as the idea that there are many producers in BC whose output does not seem to be large enough to justify some of the costs that the new regulations will entail. A circular definition, indeed, but I hope the reader sees my point.

Unlicensed Farm Gate Sales: A cause of health problems in our meat production system?

Why do we need any regulation in the first place? It is a question worth asking given the extra costs and complications they often bring to a production process. One answer seems intuitive to me; we need regulation any time that choices made during the production of any product have the potential to produce significantly negative societal effects. For meat production, the obvious possible negative effect is the risk posed to human health by unsanitary production practices. Few would argue that meat, if produced incorrectly, can cause hazards for humans who eat it. But how great are the risks, at in what circumstances must they be addressed?

With the large producers there are a number of intermediaries between producer and consumer and the need for regulation seems clear, since at least three factors that may reduce the likelihood of improper production methods—trust, accountability, and a producer’s pride in his or her work—are much diminished in large food chains. Here, the producer and consumer will never know each other, the meat’s origins are difficult to trace, and the producer does not see his or her product through every process from pasture to plate. Whether government intervention is required when a consumer buys directly from a farmer is less certain. Here, trust, accountability, and producer pride are present in much greater amounts, or so say some of the people I talked to who question the need for regulation of the small producer.

One such person is Hans Karl, a rancher near Clinton, BC. He and his family have been producing beef for 17 years, 90% of which they sell as quarters and sides directly to their customers. The 80 cows the family raises each year are grass-fed and organic. They slaughter them, one per day, in their small slaughter facility beginning every autumn. Hans is obviously proud of his operation as he tells me that it has never produced a reported case of contamination, it minimizes stress on the animals since they never have to leave the ranch, his costs are reasonable, and his customers return each year to buy from him, some coming all the way from the lower mainland. For these reasons, Hans doesn’t see the need for new regulations given the costs and obstacles they will bring. He also doubts they will improve the safety of his meat.

Felix Shellenburg, an organic producer of beef, pork, and lamb in the Chilcotin, agrees. “Can you name one person who got sick or died from farm gate meat?” he asks. “If a farmer wants to kill an animal on his farm and sell it at the farm gate, he should be allowed to.” He feels that customers know exactly what they are eating when they buy directly from a farmer, and if they are okay with it, then government intervention is unnecessary.

Amie Harbor is a customer who is “okay with it.” A Summerland resident who has purchased at least a quarter of beef at the farm gate of neighbouring ranchers for five years, she does so because it is cheaper, local, and she thinks a connection to the small farmer is important. She also does not see the need for any change to the way her neighbours produce. “If you know the person you’re buying from, and are referred by word of mouth, there is no need for [the regulations]. They (the government) think they are looking after our needs, but really they are just taking away choice.”

Yet some people I talked to feel otherwise. “Meat inspection is the cornerstone to animal health,” says Dave Fernie, owner of Rodear Meats, a small meat processor east of Williams Lake that is required to use meat inspectors during slaughter and processing. “These guys [non-inspected producers selling at the farm gate] can say they’re doing their best, but there is a world of difference between inspected and non-inspected meat.” Fernie explains that inspectors lend a professional, unbiased eye to the slaughter process, and can spot problems that some producers do not have the knowledge, and sometimes the incentive, to see. He says that a lot of meat is technically safe to eat, but unwholesome, telling me that his inspectors routinely remove meat that contains arthritis, cancer, lung disease, and parasites. None of these will kill a person, but according to Fernie they should not be consumed. It is this unwholesome meat that some, though not all, producers do not know how to identify, he says, which is why meat inspection should be required for anyone selling meat for human consumption.

Larry Copeland, Director of Food Protection services at the BC Centre for Disease Control and the man charged with overseeing BC’s meat regulations, shares this conviction. When I questioned the need for Hans Karl and other small-scale producers to possess a license, he answered assertively: when human health is at stake, all precautions must be taken. And since it is well established that meat and poultry can cause health problems if not properly handled, it is essential that all links in the production chain be safeguarded against contamination. “You have to consider slaughterhouses in the context of what our food system is about—it is a continuum, and if you break the chain you can produce hazards that aren’t controlled.”

Copeland’s main point is hard to dispute: improperly handled meat can cause contamination, and licenses, while not guaranteeing a safe product, increase the likelihood that meat is being properly handled.

In response to Felix Shellenburg’s challenge to show him someone who has become sick or died from eating farm gate meat, Copeland responds, “the problem is that they [unlicensed producers] can’t say there are no problems.” Food-borne illnesses are rarely reported and difficult to trace, he continues, thus it is not entirely fair to conclude that a lack of reported cases proves that unlicensed farm gate meat is safe.

If Copeland’s main argument can be accepted, two questions are in order. The first is whether small-scale producers are handling their meat properly. Interestingly, while every producer I spoke with told me that they do, each one also told me they know of at least one producer who does not, due to either lack of skill or lack of responsibility. Thus it seems safe to conclude that at least some unlicensed meat being sold at the farm gate is not being produced to satisfactory standards for community consumption.

The second question, following from the answer to the first, is whether the government should intervene with regulations to solve this problem. I have already indicated that some producers answer no, arguing that the market will take care of the sloppy producers—consumers will stop supporting them—and thus the extra costs involved with regulation are unnecessary. Surprisingly, however, a majority of the producers with whom I spoke, mostly small-scale ones, agree with Dave Fernie and Larry Copeland, supporting the need for a standard set of regulations to ensure that producers are operating as safely as possible, for the good of their consumers. A few even believe that rather than automatically representing a significant cost burden to the farmer, a properly designed regulatory regime can be profitable to producers because consumers will feel

more confident purchasing meat.

The issue of consumer confidence provides a useful bridge to another relevant point in this discussion. In my research, I found that the issue of health is not the only factor that influenced the decision to change BC's meat production regulations. Consumer perception is a perfect example. Consider this explanation for the change, found in a backgrounder issued by the provincial government: "the regulation provides consumers with the assurance that all meat and meat products are properly inspected for safety."¹ Notice that the ineffectiveness of the old system at protecting consumers is not disputed; rather, it addresses an alleged *perception* that the old system was ineffective. This perception is referenced in other government releases. Corky Evans, the BC Legislature agriculture critic, also mentioned it when he speculated to me about the government's reasons for implementing new regulations.

I use the word 'alleged' above because statistics on meat consumption in Canada are inconsistent with this explanation. If consumer confidence did decrease following the much-publicized Mad Cow scare in 2003, or BC's Avian Influenza disaster in 2004, a corresponding decrease, at least a temporary one, in demand for these products can be expected. Yet Statistics Canada recorded an increase in beef consumption immediately following the Mad Cow Scare, which reflects consumers "rallying behind their beef industry."² While no statistics are available by province, I cannot imagine that BC consumer behaviour would deviate greatly from the national average. Similarly with poultry, Statistics Canada recorded no significant drop in poultry sales following the culling of 19 million chickens in BC in 2004 due to an avian influenza outbreak.

This inconsistency has led some to speculate that another factor—increasingly stringent American Trade Policy—is the more likely influence behind the regulations. For example, various bans on cattle and beef imports from Canada into the United States have cost Canadian beef exporters billions of dollars since 2003.³ This has left some, Corky Evans among them, to speculate that US demands on all aspects of its trading partners' beef production have required Canada to make changes even to its domestic production rules in an effort to have the ban lifted. If this is true, and it influenced the recent changes to BC's regulations, it is unclear why the BC government would make no mention of it when they announced the changes. One possibility is the worry that farmers producing meat only for the domestic market would be outraged by production changes required for exported meat. Unfortunately I was unable to find any US policy documents to substantiate the claims by some that US agriculture authorities are setting requirements for Canada's domestic production.

What is evident is that the decision to change BC's meat production regulations was based on a number of factors. These included human health, public opinion, and international trade pressures. I will leave it up to the reader to decide if a change was justified. However, given my opinion that the argument for reform based on health concerns is not completely baseless, and the reality that regardless of what is right, the regulations have changed, in the next section I examine the new regulations in terms of their impact on the industry, and whether they represent the best option for reform to BC's meat industry.

1 Backgrounder, Meat inspection regulation. Ministry of Agriculture and Lands/Ministry of Health, Government of British Columbia. Posted April 3, 2006. http://www2.news.gov.bc.ca/news_releases_2005-2009/2006AL0008-000360Attachment2.htm

2 Statistics Canada. "Food Consumption." News Release. May 26, 2005. <http://www.statcan.ca/Daily/English/050526/d050526c.htm>

3 United States Department of Agriculture. "Background Statistics: US Beef and Cattle Industry." Posted August 11, 2006. <http://www.ers.usda.gov/News/BSECoverage.htm>

The new regulations: their impact on, and compatibility with BC's Meat Industry

I mentioned above that a majority of the producers with whom I spoke endorse the idea of standardizing BC's meat production regulations. Yet, most criticize the specific changes the BC government has introduced. Are these criticisms, however, merely the inevitable grumblings that occur in the wake of any social change, or do the grievances of the small-scale producers indicate a crucial flaw in the new regulations? To answer this question I will first elaborate on the criticisms being made by the producers I interviewed.

Perhaps the most common criticism is the lack of infrastructure in much of the province to meet the increased demand for processing facilities created by the regulatory change. Some producers face a complete lack of local facility availability, such as Don Richardson, a Queen Charlottes rancher who will have to ship his animals twelve hours by ferry and then hundreds of kilometers to reach the nearest licensed processor. "To be really honest with you, if I had access to a provincial facility, I'd be right there," he says, adding, "the job of slaughter isn't that pleasant anyway." Others have access to local infrastructure, but there is not nearly enough of it to meet demand. The result has been three-month waiting lists to have animals slaughtered in some areas, which is undesirable given that animals are best slaughtered at a certain time of year.

Another criticism is the increased costs to farmers of the new regulations, because of either the necessary facility upgrades or having to ship animals to other facilities. Numerous producers I interviewed expressed their inability to invest the thousands or hundreds of thousands needed to upgrade, or deal with up to a 100% increase in production costs, as is the case with one Ostrich producer with whom I spoke.

A third criticism is an inconsistency in information and position from the BC government that is hindering those trying to adapt to the new regulatory regime. Such is the claim of Dirk Keller, a Vancouver Island farmer. Keller entertained the possibility of developing a commercial processing facility to fill the local demand created by the coming changes, but wanted the province to guarantee that the regulations would be implemented, and that the facility he built would be approved. The province was unwilling to do the former, and told him he had to build a facility first before they would approve it. He also received different answers depending on the department he spoke with. Keller eventually gave up in frustration.

Another common complaint is that these regulations were created after very little consultation with small-scale producers, the result being that they attempt to apply a "Wal-Mart standard to a corner-store operation," in the words of small-scale island producer Laurie Gillis. She explains that some aspects of a regulatory system influenced by large-scale conditions are not compatible with certain small-scale ones. One example is the incompatibility of the high-efficiency machinery used in processing facilities, designed specifically for industrial-system birds bred to be genetically uniform in size and shape, with the specialty breeds of varying shapes and sizes being produced by many small-scale producers. This often results in a higher incidence of bruising that forces inspectors to reject the birds. Another example is the requirement that all licensed facilities contain an office and bathroom for inspectors, a stipulation that seems an unnecessary waste of space and money for a small, on-farm facility processing twenty head of cattle per year.

The new regulations, then, do have some problems, but are these shortcomings irrevocable? Our government does not think so. In 2004 it created the five million dollar Meat Industry Enhancement Strategy with the tacit goal of addressing many of the criticisms of their regulations. Administered by the BC Food Processors Association, the strategy consists of a number of programs, including a help desk intended to give producers the consistent, helpful information that Dirk Keller felt was lacking when he looked into his options before the program began.

Another program offers fifty-fifty cost sharing of up to \$50 000 to individual producers who want to upgrade their facilities, and similar subsidies to community groups who submit a “community solution” such as a cooperatively-run facility. Yet many farmers who complain of the prohibitive cost of upgrading do so with full knowledge of the subsidy program, pointing out that a \$50 000 subsidy is not sufficient for renovations that some project to be into the hundred of thousands of dollars. However, by the September 30, 2006 deadline for individual applications, 58 proposals had been submitted, a sign that at least some feel optimistic that adaptation is affordable.

Lars Jorgensen is also optimistic that the regulation’s shortcomings can be overcome. He is responsible for a promising solution to the cost and accessibility problems outlined above: the mobile abattoir. Developed by Jorgensen and his colleagues, these slaughterhouses can reach any farm with a driveway and enough room to turn the modified semi-trailer around. Each unit can process up to fifteen large animals per day, at rates he says are competitive with stationary facilities. Originally prohibited by health authorities, Jorgensen now has one approved unit for slaughtering large animals running in BC, with eight more slated to run by February of 2008, and a mobile poultry abattoir in development.

Jorgensen thinks mobile abattoirs are a viable solution because they eliminate both the risk of cross-contamination that can occur in centralized facilities and the compromise in animal welfare inherent in shipping animals over long distances. While the units do have a limitation--unfortunately, any farmers with less than a day’s work (12-15 cattle) for the abattoir are not worth the trip—they promise to solve the challenges faced by many of those who have criticized the regulations.

While it has not reached a complete solution, it appears that Victoria's Meat Industry Enhancement Strategy and Lars Jorgensen's mobile slaughterhouses may be an effective means of addressing some of the discussed challenges. But I still have not examined the issue of whether these initiatives could have been avoided in the first place if the regulations had been better designed.

Dan Ireland does not think so, because he believes there is nothing wrong with the regulations themselves. A small-scale operator with his family on Vancouver Island, he shares many of the frustrations of his colleagues. But Ireland also worked in the bureaucracy of BC’s Ministry of Agriculture for over twenty years until very recently, and insists that the regulations need no revision because the regulations, as they are written, are not the problem. Rather, he says, the regulations are being interpreted too narrowly and too inflexibly by the bureaucrats and inspectors in charge of their administration; hence the challenges that many producers are facing.

Ireland explains that the regulations were written to be outcome-based, meaning that producers are supposed to be given flexibility in how they meet the end goal of proper slaughter procedures. Thus, a producer who needs to upgrade her facility to meet the new requirements should have a number of options for how to do so, depending on the idiosyncrasies of her operation. Instead, says Ireland, many inspectors are evaluating facility renovations based on a narrow set of standards that are not applicable to many operations, hence Gillis’ complaints about a large-scale standard being applied to small-scale situations.

After speaking with Ireland and others with similar opinions, I examined the regulations and found his claims about the language in the regulations are valid. One example is this excerpt from the regulations, covering requirements for the cleaning of equipment in a slaughterhouse:

“A licence holder must ensure that all equipment in the slaughter establishment or meat processing establishment, as the case may be, is

- (a) constructed from materials that are
 - (i) suitable for their intended purpose, and

- (ii) durable, easily cleaned and free from any noxious or toxic substance,
- (b) in good working order, and
- (c) operated in a manner that ensures that the handling of animals and carcasses is sanitary and is without risk of contamination or spoilage of carcasses.”⁴

Notice that there are no specific guidelines for how to achieve these goals. Rather, only the goals themselves are stated. Yet, according to Ireland and others I spoke with, the inspectors in charge of approving slaughter facilities are holding producers to a rigid set of expectations for slaughterhouse design and other operation aspects, which is making it hard for producers to obtain approval without prohibitive costs. Ireland speculates that the reason for the inspectors's rigidity is at least partly due to the BC Centre for Disease Control's decision to hire federal inspectors to oversee inspections, the implication being that these inspectors are used to being much more stringent than required in a provincial environment.

Those who have attempted to present alternative ideas on how to regulate the industry have been met with similar inflexibility from bureaucrats and politicians. Don Richardson, the Veterinarian-Producer from the Queen Charlottes mentioned above, has been lobbying the government to consider revisions to the regulations, to no avail. He argues that there is a difference between commodity beef, that is, beef that changes hands more than once between production and consumption, and beef that is raised by a producer and eaten by the person who purchases it. Thus, he feels this difference should be reflected in the regulations, as it has been up until now. In a policy document he submitted to the BC Ministry of Health,⁵ Richardson proposes that in lieu of a provincial license, producers selling meat directly to consumers at the farm gate could be required to pass a food safety exam, possess insurance, and keep detailed records of their production procedures. Alternatively, he suggests a 'friends and family' clause that would extend the exemption enjoyed by those slaughtering and consuming their own animals to friends and family of those producers. The Ministry has turned down all aspects of his proposal.

Producer Laurie Gillis worries that the new regulations will drive many producers underground, and agrees with Richardson's suggestion that a course-based certification process similar to Canada's FOODSAFE program would be a lot easier to implement and would be more compatible with the needs of small producers.

It is possible the Ministry of Health has given careful consideration to these ideas and ruled them out as unrealistic. But given the consistent belief among small producers that their needs were largely ignored during the planning process, and the widespread discontent with the regulations, it appears that bureaucratic stubbornness represents at least a partial influence on the inflexibility in question.

Conclusions

I began the second section of this report with the hypothetical assumption that a change to BC's meat regulations was necessary, in order to create the conditions sufficient to explore what form any new regulations should take. Now, I will examine that assumption.

First, the factor of health and whether unlicensed slaughter facilities pose a significant risk to British Columbians. It is incontestable that meat can be contaminated during the process of slaughter. And many meat producers I spoke with agree that some producers are failing to take enough care when they slaughter.

⁴ Ministry of Agriculture and Lands. Meat Inspection Regulation. Posted July 23, 2004.
http://www.qp.gov.bc.ca/statreg/reg/F/349_2004.htm

⁵ Appendix I

Furthermore, I agree with the BC Centre for Disease Control's Larry Copeland's contention that a lack of reported cases of illness from consumption of farm gate meat can be equated with a lack of cases of illness. He is correct: such contaminations are difficult to trace.

Still, Copeland was unable to provide me with any substantial evidence to support our government's, and his office's, health concerns. Nevertheless, I am sure some outbreaks occur, and it is this fact that appears to be the main motivation for the regulatory change. I wonder though, if the price we are paying for what seems to be the avoidance of precious little actual human illnesses—or even, to be fair to our health authorities, the risk, however small, of a gigantic outbreak—is too high. I am sure I could reduce my risk of disease and illness if I required all visitors to wear space suits when they come through my door, but the risk does not seem to justify the precautions. The meat issue more complicated. But my question still warrants consideration, since the preservation of life and limb at all costs is not an indisputable governing philosophy. In my opinion, our society is too consumed with the preservation of health and life. I would sooner buy the unregulated beef from a farmer I trust, and take my chances. If Larry Copeland wants me to think otherwise, I need more conclusive data.

As to the role that negative consumer perception played in the enacting of BC's new meat production regulations, it seems logical that such a perception, if it actually exists, should be addressed. But would it not have made more sense for our government to conduct an aggressive advertising campaign, rather than reform our meat production regulations? Thus, whether a Red Herring or just an error in thinking, the perception argument is unconvincing.

The international trade issue, if actually a factor, puts our authorities in a difficult position that I do not envy. On this factor I will only comment that if the US is indeed requiring that animals that will never cross into its territory be slaughtered to its standards, our government should be more open about this requirement, and consult its citizens about whether the economic gains of sending meat south of the border is worth the ceding of authority over domestic matters.

Overall, though, I am not sure I am informed enough, nor is my research strong enough, to make any sweeping conclusions about whether BC's meat production reforms are necessary. I can only ask questions, as I have, about what my research has revealed, and suggest that at the very least, more public debate should happen before we proceed down the path of reform.

Unfortunately, we may be past that point, and so the relevant question becomes whether the new regulations represent the best option we have for reform. It may be too early to say. The efforts of the government's Meat Industry Enhancement Strategy seem to be bearing fruit, though one insider of the initiative reports that it is not happening fast enough to avoid any arguably needless adjustment pains. The recent provincial approval of Lars Jorgensen's mobile abattoirs also promises to alleviate some concerns surrounding the regulations, though there are many producers who will not be able to give him the minimum amount of animals required per day to justify the use of his abattoir.

It is evident, however, that the government has been too inflexible in both the administration of the regulations and their willingness to consider alternative methods of ensuring public safety. My research suggests that this has resulted in a number of requirements that are unnecessarily incompatible with the needs of small producers. This partly stems from a failure by the government to properly consult with small farmers when the new regulations were being developed. While they cannot undo this lack of consultation, they can ask the regulation's overseers to ensure that its inspectors are interpreting the regulations as they were written; that is, flexibly.

I will finish with some comments on what we can learn from all of this. While ultimately it is our government's responsibility to maximize the public good, there are steps we all can take to help it do so. One suggestion of my research is that small-scale producers are not sufficiently organized to prevent future snubs when their government is making policies. There are regional organizations, and their function is very important, but I suspect that a strong province-wide lobby would be more capable of snatching the ear of our provincial politicians and bureaucrats when important policy decisions are being made.

As consumers we need to be more willing to spend more to support our small producers. Dave Fernie of Rodear Meats sums it up nicely: he would like to be able to sell his gourmet processed burgers to retailers in Vancouver, but even a few cents difference per burger compared to his larger, out of province rivals puts him out of competition. Many of us are willing to spend a few more dollars on our food within reason, but how many among us decide to buy locally produced beef no matter what the farmer's costs?

If we did, we might find more incentive to make it clear to our politicians that we do not support policies that impede the production methods that matter to us. Ideally, we would be doing this anyway. But in reality most of us will never actually write that letter we know we should write. At least, I never do. I am confident I would, however, if my ground beef jumped to 10 dollars per pound.

I hope that our small-scale producers will find a way to manage the challenges by BC's new meat production regulations. But there is a limit to what our small producers are willing to tolerate, and we and our government had best strive to ensure that the burden does not become too heavy.

Appendix I: Veterinarian/Beef Producer Don Richardson's Regulatory Proposal to the BC Ministry of Health

Suggested regulatory approach for sensible control of farm direct sales of meat in BC

SECTION 1 – MEAT NOT FOR SALE

A. Meat exempt from all Ministry of Health Regulations

1. Wild Game processed and consumed by the hunter
2. Domestic Animals killed, processed and consumed on owner's property
 - No commerce involved (no one is paid to kill or process the animal, no change of ownership involved)
 - Exempt from all health regulations
 - Regulated by Livestock Act and Wildlife Act

B. On-farm custom kill

- Butcher who can be hired to slaughter and process animals on farm for farmer's own personal consumption
- May involve mobile facility
- Meat not for sale or distribution off farm (could be stamped "not for sale" as is done in Alberta)

Regulated and licensed by Ministry of Health/BC Centre for Disease Control – including requirements for

Farm Butcher License:

1. Must have BC Food Safe Level One certificate
2. Individual must carry minimum \$1 million liability insurance
3. Any mobile facility used for on- farm slaughter must meet a minimum level of inspection certifying it as suitable for such a purpose (e.g., as this mobile facility will enter multiple premises it is paramount that it be constructed so as to be easily cleanable both for production of a wholesome product as well as to maintain the biosecurity of each farm entered)
4. Minimum record keeping (e.g., records of what, when, where and for whom)

SECTION 2 – FARM DIRECT MEAT SALES

A. Farm Direct Meat Sales

1. Restricted to domestic animals born and raised on the licensed farm or beef animals that have been resident on farm for more than 24 months or swine that have been resident on farm for more than 12 months or goats and sheep that have been resident on farm for more than 18 months or poultry that has been purchased at less than one week of age, raised on the farm to slaughter age in a flock which is small enough to be not subject to the quota for that species
2. Killed and eviscerated on farm or farmer may have animal slaughtered in licensed facility off farm and meat returned to farm for sale
3. Meat may be processed at farm (i.e. cut and wrapped, made into sausage, jerky etc.)
4. Farmer may take meat to licensed facility for further processing and return product to farm for sale
5. Sold by farmer directly to final consumer only
6. Consumer must pick up product from farm
7. Consumer may take product to licensed facility for further processing
8. Product not for resale or redistribution in any way (could be stamped “not for sale” as is done in Alberta)

Regulated and licensed by Ministry of Health/BC Centre for Disease Control - including requirements for **Farm Direct Meat Sales License:**

1. One designated individual involved in the on-farm processing must have BC Food Safe Level One certificate
2. The designated individual and farm must carry minimum \$1 million liability insurance
3. Record keeping and labeling to allow trace back of product to farm and records of customers

Notes of explanation regarding farm direct meat sales

#	Comment
1	This is intended to prevent a farmer from purchasing animals for fattening and slaughter only, but allows on-farm slaughter and processing of breeding stock culls along with those animals born on the farm. This limits the size of the enterprise which in turn increases traceability and reduces amount of records needed to be kept by one operation.
2,3,4	Allow the farmer to use licensed facilities for slaughter and or processing of his meat prior to direct sale by the farmer to the consumer. This allows for such products as jerky to be sold at farm gate after processing in off-farm licensed site.

5	This is the fundamental building block of farm direct sales and establishes a contract between farmer and consumer and its implied common-law liabilities.
6	Ensures no unregulated third party such as a trucker. This also limits the size of the enterprise by limiting the service area to the distance the consumer is willing to travel to retrieve the product from the farm. This also prevents the product from being sold in such off-site venues as farmers' markets.
7	Allows consumer to purchase by side or quarter from farmer but have a licensed facility do the cutting/wrapping or further processing.
8	Meat from animals in this category can not be sold to restaurants or butcher shops for resale or even donated for further distribution.
9	This acknowledges the liabilities involved and demonstrates commitment to minimum standards by the farm/farmer. BC Food Safe program could be substituted with a specific short course designed and administered by BCCDC specifically for this meat program (could possibly be online course).

B. Off-farm Custom Slaughter and Processing Facility

- Kills and/or processes only animals that are owned by the consumer
- Meat is not for sale or distribution from this facility
- Allow for farmer drop-off of live animal after purchase by consumer
- Consumer must pick up product from facility
- Allow for joint ownership (maximum of four) with each owner picking up a minimum of one quarter of the carcass
- Does not provide for grinding, processing or jerking of over 30-month animals with multiple distributions
- May provide cut and wrap and further processing services for hunters
- May provide the cut and wrap service and further processing for consumers who deliver the meat they purchased from Farm Direct Meat Sales

Regulated and licensed by Ministry of Health/BC Centre for Disease Control - including requirements for **Off-Farm Custom Slaughter and Processing License:**

1. Must have BC Food Safe certification
2. Plant must carry minimum \$2 million liability insurance
3. Achieve a minimum level of facility standards and inspection by local health inspectors similar to local grocery meat counters
4. Must have appropriate Ministry of Environment approval for disposal of slaughter wastes and SRMs

SECTION 3 - COMMODITY MEAT

A. Federally or Provincially Licensed Slaughter Plants

- With pre- and post-mortem meat inspection
- Will process for anyone under an appropriate contract
- All products are for sale locally, inter-provincially or internationally depending on license
- Licensed and inspected by BC Ministry of Health and CFIA

B. Provincially Licensed Meat Shops

- Buy and sell only inspected product from federally or provincially licensed slaughter plants
- These products are for sale locally either directly to consumers, or via restaurants and food stores
- Licensed and inspected by BC Ministry of Health/BC Centre for Disease Control
- May have additional license to allow for processing of wild game or un-inspected meat received from and returned directly to the consumer, with protocols to ensure no contact of uninspected meat with commodity (inspected) meat

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Dec. 1st, 2005

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See Appendix I