

# BC Food Systems Network

info@fooddemocracy.org

www.fooddemocracy.org

---

Attention: The Honourable Gordon Campbell, Premier of British Columbia

CC:

The Honourable Pat Bell, Minister of Agriculture and Lands

The Honourable George Abbott, Minister of Health

The Honourable Rick Thorpe, Minister of Small Business and Revenue and Minister Responsible for Regulatory Reform

Blair Lekstrom, Parliamentary Secretary for Rural Development

## **Re: BC's Meat Inspection Regulation: implementation slaughters small-scale meat production**

September 20, 2007

To the Honourable Premier:

The BC Food Systems Network is comprised of a diverse group of organizations, and farmers, nutritionists, Aboriginal peoples, chefs, and more. The Network was formed eight years ago to link people from across the province involved in community-level action related to food.

Government will recall that we offered comments and recommendations on the Meat Inspection Regulation (MIR) in September 2004 (see attachment). At that time we agreed in principle with meat inspection but had concerns about how the MIR would be implemented. Our worst fears are being realized.

Meat processors are essential to the viability of the entire livestock and traditional foods sectors.

Now as we approach the watershed of the 30th of September we are extremely alarmed by the degree of attrition in livestock production and meat processing that is occurring in our communities.

At a time when there is unprecedented consumer demand for local foods, small-scale production and humanely raised meat animals, for reasons of health, environment (reducing food miles that contribute to climate change) and regional development, it seems particularly tragic that those BC producers and processors best placed to deliver these services should be driven out of business.

BC has an opportunity to position itself as the leading jurisdiction in North America in livestock and meat, in line with our goals around Act Now, 2010, the Climate Change Initiative and the New Relationship with Aboriginal peoples. However, in order to fully realize these goals, we require a meat inspection system that is proportionate to the size and scale of production and that allows for a more flexible and less financially onerous inspection regime so as to keep small-scale, community-based production viable.

Our key concerns and recommendations are as follows:

### **Concerns**

- There is a lack of coordination amongst the regulatory agencies that has resulted in confusing and contradictory messages.

- Many processors wishing to comply with the MIR find the cost prohibitive and the process daunting. Even licensed plants risk significant economic instability due to complex and costly process and infrastructure demands from inspectors and regulators. Regulators are inflexible and do not respect the needs of local and regional processors and producers.
- Regulators do not respect local knowledge and do not demonstrate an understanding of the small- and medium-scale meat industry.

## **Recommendations**

### **The Government should:**

- 1) Mandate a Task Force to evaluate the implementation of the MIR from 2004 to date, and report to the Legislature by end of January 2008. The Task Force should include MLAs, plant operators and producers, as well as government agency and Aboriginal and community representatives.

The Task Force may wish to:

- Address the issue of underserved regions of the Province for all animal species.
  - Recommend establishing an industry and consumer oversight body that will monitor MIR implementation on an ongoing basis (as recommended in the BC Centre for Disease Control's Plant Construction, Equipment and Operation Guidelines General Principles).
- 2) Establish a post-30 September MIR transition period that will allow those plant operators working towards licensing to continue operations and find reasonable solutions for sale of existing meat inventory. Provision should also be made to legalize slaughter this fall of animals that cannot feasibly be slaughtered by the deadline.
  - 3) Strengthen the appeal system under the Food Safety Act for parties aggrieved by decisions of the regulator. Appeals should go to a neutral third party, not back to the BC Centre for Disease Control. Consider the introduction of an administrative tribunal.
  - 5) Given that facility costs have escalated due to regulators' demands and to increased construction and labour costs over the past 3 years, ensure more money is provided through the Meat Transition Assistance Program in a way that is fair and proportionate to the needs and solutions in given communities.
  - 6) Avoid the inappropriate application of federal standards to provincially registered plants by developing a provincial inspection service for provincially licensed facilities.

We stand by the analysis and recommendations we made three years ago. We look forward to working with you to ensure a viable provincial meat sector.

Sincerely,

Jen Cody, Chair  
 The BC Food Systems Network  
 Contact: 250 753-3070  
 46 Robarts Street  
 Nanaimo  
 V9R 2S4