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August 30, 2019

To: The Directors of the Columbia Shuswap Regional District

**Re: Discussion Paper to Solicit Feedback from Local Governments about Class D Licences**

The BC Association of Abattoirs represents livestock producers, abattoirs and butcher shops throughout the province. We actively encourage new entrants to the industry, provide guidance on regulatory issues, deliver training and other support services to ensure the meat industry remains viable. Our goal is to 'Keep BC Meat in BC'.

The BC Ministry of Agriculture recently released a discussion paper to solicit feedback from local governments about Class D licenses (uninspected meat). This is the third initiative that our current government has undertaken to increase uninspected meat sales in the province. Inspection was brought in to ensure national and international expectations of food safety and animal welfare are met. There is no reason to increase uninspected meat in this province since the impact to the consumer and inspected abattoirs will be damaging.

Uninspected Class D and E abattoirs are licensed by the regional Health Authorities. A one-day SlaughterSafe course is delivered by Environmental Health Officers (EHOs) for those interested in operating a Class D or E abattoir. This course does not cover slaughter methodology, reportable animal or zoonotic diseases, identification of meat not fit for human consumption, the National Farm Animal Care Council's Codes of Practice, or any of the federal and provincial mandatory reporting requirements. There is no assessment of knowledge or skills done during or after the SlaughterSafe course. Many of the existing facilities only receive a site visit upon licensing and are never visited again by their EHOs. The facility may be inspected on an ad-hoc basis, but there is never meat inspection.

Recently, a training program was held for existing Class D and E operators and their EHOs throughout BC. The training program was delivered by specialists in the subject matter of humane slaughter and food safety as it directly relates to slaughter. The results of the before-and-after workshop survey indicated that the level of knowledge of the operators and the EHOs was low, and the retention of the information was poor. It was expected that after attending the SlaughterSafe course, the operators would have better knowledge of ante-mortem inspection, proper removal of contaminated tissue, how to ensure a humane death and checking for insensibility before proceeding. Unfortunately, that was not the case.

Without assurance that the uninspected Class D and E operators have been properly trained or their skill level assessed, the consumer cannot be confident that proper animal welfare and slaughter food safety practices are being followed. While these operators may have the best of intentions, without oversight on the day of processing, there is no verification. **Trust but Verify.**

The Inspectors at Class A and B abattoirs ensure animal welfare and humane slaughter practices are in place, animal reportable and zoonotic diseases are identified and handled according to required protocols, the carcass shows no sign of systemic illness and meat not fit for human consumption is removed.

Within the CSRD, the Class A operators are small-scale, family owned and operated. They hire workers, pay taxes, contribute to BC's economy and provide a safe product to BC consumers. By allowing uninspected plants, the impact on these businesses could be the difference between survival and closure. There will also be an impact on small producers who are not able or interested in doing the slaughter themselves.

The following are the Inspected Class A and B abattoirs within the CSRD:

- Farmcrest Foods
- Rocana Meats
- Silvernails Abattoir

The BC Association of Abattoirs, after a two year delay from submitting the initial proposal, is undertaking a BC Meat Capacity Study to investigate the issues related to increasing both meat animal production and processing. The report will be available in early 2020, and without the results from this in-depth quantitative analysis, any decisions may cause irreparable harm to the industry.

**Early results of this study indicate that slaughter capacity is not the issue. It is the cutting and wrapping that is the bottleneck. Increasing uninspected slaughter will not address this issue.**

In BC, there are 57 provincially inspected abattoirs, 111 uninspected abattoirs and 13 that are federally inspected. According to statistics collected by the BC Meat Inspection Branch, less than 26,000 beef animals are processed per year in total at all the Class A and B abattoirs throughout the province. For an indication of scale, one Cargill plant in southern Alberta can process 5,000 beef animals per day. This Cargill plant can process the entire BC volume in less than 6 days. None of the inspected BC Class A or B abattoirs are big or industrial.

**Drinking water standards in BC are continually tightened, but meat standards are being relaxed.**

While we sympathize with the plight of small livestock producers, allowing uninspected meat is not the solution. Instead, we would like the CSRD to support the licensed and inspected abattoirs in your area and help them increase capacity, access skilled workers as well as help livestock producers finish their animals throughout the year to alleviate seasonal bottlenecks. The CSRD should help livestock producers interested in becoming uninspected Class D or E abattoirs to become an inspected Class B since this will have more of a positive economic impact on the region and the abattoir.

Thank you very much for your consideration. If you require any additional information, please don't hesitate to contact me.

Sincerely,

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