



Class D and E Licence Consultation: Summary of Survey Responses

June 2018

Table of Contents

Background 1

Nature of responses received 2

Responses from Class D and E applicants 4

Responses from Regional Health Authorities 21

Responses from Industry Associations 35

Conclusion..... 43

Appendix 1: Survey data 44

 Responses from Class D and E applicants 44

 Responses from Regional Health Authorities 80

 Responses from Industry Associations 90

Background

To help improve food security in rural communities and help more British Columbians enjoy BC beef, pork, poultry and lamb, the Ministry of Agriculture (Ministry) consulted with small abattoirs and other stakeholders in March and April 2018 for feedback and suggestions on how to improve rural abattoir licensing in BC.

The responsibility for licencing provincial abattoirs is shared between the Ministry and the Ministry of Health. The Ministry has the authority and responsibility under the *Food Safety Act* and the Meat Inspection Regulation to licence and inspect Class A and B slaughter facilities. The Ministry also has the mandate to inspect and investigate suspected unlicensed and unlawful slaughter. The Ministry delegates administration of licensing, compliance and enforcement of Class D and E slaughter facilities – which are meant to support rural slaughter – to regional health authorities (RHAs).

Class D licences support local food production and food security in areas of BC that have a low population density, low animal production levels and where it is unlikely that a Class A or B facility will open. Class D Licence holders are allowed to slaughter up to 25,000 pounds per year of their own or other people’s animals, for direct sales to consumers or to food businesses such as restaurants and meat shops in the region in which the meat was produced. Class D licences are only available in the 10 regional districts that have been designated as rural remote areas in the Meat Inspection Regulation.

Class E licences are also meant to support local food production and food security in any area of BC that has low population density, low animal production levels and where a slaughter need is currently not being met by Class A and B facilities. Class E licence holders may slaughter up to 10,000 pounds per year of their own animals (only) for direct sale to consumers (only) in the area in which the meat was produced.

There are currently 21 Class D Licence Holders and 31 Class E licence holders in BC.

Class E licence applicants must submit a feasibility study that examines:

- travel time to Class A or B abattoirs
- transportation challenges, such as marine transport and seasonal road closures
- species slaughtered
- specialty slaughter needs (organic, Kosher, Halal)
- custom slaughter
- seasonal slaughter

Current and expired Class D and E licence holders, applicants who were denied, and those who were approved but never licensed were asked to describe their experiences related to the administration, licensing, operations and food safety of their abattoir, and to discuss ideas that could enhance local slaughter capacity throughout the province. The Ministry also gathered input from key stakeholders

including the BC Association of Abattoirs, the BC Cattlemen's Association, the BC Sheep Federation, the Small Scale Meat Producers Association, and RHAs.

The consultation was limited to Class D and E licences only, and did not consider provincial A and B licensed, or federally licensed slaughterhouses. The consultation is part of a review of the province's rural slaughter capacity by the Ministry to support BC meat production, ranchers and livestock producers in rural communities.

Nature of responses received

The Ministry received feedback through a confidential survey. One survey was developed for each of the three stakeholder groups: 1) current and expired Class D and E licence holders, applicants who were denied, and those approved but never licensed; 2) industry associations; and 3) RHAs.

The Ministry invited 200 Class D and E applicants to participate. In total the Ministry received feedback from:

- 65 Class D and E applicants
 - 45 Class E
 - 20 Class D
 - 51 percent of the responses came from the Interior Health Authority
 - 21 current licence holders
 - 31 expired licence holders
 - 11 denied
 - 2 approved but did not proceed with licensing
- 4 industry associations
 - 11 industry association members
- 5 RHAs
- 1 regional district

Of the 65 responses from Class D and E applicants, 17 surveys were conducted over the phone, and 48 were emailed, mailed or faxed. All of the surveys were structured with Likert scale questions (a five point scale ranging from very satisfied/very familiar to very unsatisfied/very unfamiliar), closed questions and comment boxes to allow additional feedback and suggestions.

The summary of responses provided in this document is based on:

1. The results of the phone/email surveys
2. The contents of the written submissions within the survey

In total there were 86 valid responses.

Note: BC Cattlemen's Association, BC Association of Abattoirs, the BC Sheep Federation and the Small Scale Meat Producers Association each made a single submission representing the views of their

collective membership. The Small Scale Meat Producers Association also provided individual submissions from some of their members. In order to balance this variation, the summary distinguishes between industry associations and industry members.

Not every respondent answered every question: some questions were not relevant to some respondents. Percentage numbers that are grouped may not total precisely to ungrouped numbers due to rounding.

Responses from Class D and E applicants

Question 1: What months do you typically slaughter your animals?

Background

Some Class D and E facilities/producers only slaughter their animals during certain times of the year.

Why is this under consideration?

Class E licences are subject to a demonstrated need for slaughter that is not being met. This information provides insight into annual variability in the need for slaughter, and could help inform current requirements for the Class D and E licences.

Responses

The responses were varied, with some respondents slaughtering year round, and others only slaughtering in the winter. Overall, 50 percent of respondents slaughter red meat in October, November, December and January and 58 percent of respondents slaughter poultry in July, August, September and October.

Red Meat			Poultry		
Month	# of Responses	% of Responses	Month	# of Responses	% of Responses
January	20	7.55%	January	1	0.97%
February	17	6.42%	February	0	0.00%
March	15	5.66%	March	1	0.97%
April	15	5.66%	April	4	3.88%
May	14	5.28%	May	11	10.68%
June	12	4.53%	June	14	13.59%
July	12	4.53%	July	15	14.56%
August	15	5.66%	August	13	12.62%
September	32	12.08%	September	15	14.56%
October	45	16.98%	October	17	16.50%
November	42	15.85%	November	6	5.83%
December	26	9.81%	December	6	5.83%
Total	265	100.00%	Total	103	100.00%

Question 2: How satisfied were you with the licensing process?

Background

The current Class D and E licensing process came into effect in 2011. The licensing process has changed little since the Meat Inspection Program responsibility transferred from to the Ministry in 2014. RHAs licence Class D and coordinate with the Ministry on review of the feasibility study for Class E licensing.

Why is this under consideration?

The Ministry and RHAs may be able to improve service to clients.

Responses

58 percent of respondents were either very satisfied or satisfied with the licensing process.

Responses	# of Responses	% of Responses
Very Satisfied/Satisfied	38	58.46%
Neutral	6	9.23%
Very Unsatisfied/Unsatisfied	21	32.31%
Total	65	100.00%

Question 3: Did you find the licensing process easy to understand?

Background

RHAs administer Class D licensing. Class E licensing is shared between the Ministry and RHAs. Class E applicants must submit a feasibility study to the Ministry. The Ministry reviews the study and makes a recommendation to the appropriate RHA. The RHA conducts a review including an on-site visit prior to licensing.

Why is this under consideration?

This question is asking for specific feedback to see if the licensing process might be improved by understanding the client's experience.

Responses

66 percent of respondents found the licensing process easy to understand.

Responses	# of Responses	% of Responses
Yes	43	66.15%
Neutral	7	10.77%
No	15	23.08%
Total	65	100.00%

Question 4: If you answered "No" to Q3, what was hard to understand? (Select all that apply)

Background

Currently, the licensing process requires the applicant at a minimum to deal with the Ministry, an RHA and local government.

Why is this under consideration?

This question is asking for specific feedback in order to understand specific problems that applicants experience, and if there are any common themes, in order to consider how problems might be addressed.

Responses

Those who found the licensing process hard to understand mostly had issues with: the process being too complex; regulations being confusing; inability to find information; multiple government agencies involved in the licensing process; and the length of time to get the licence.

Responses	# of Responses	% of Responses
Regulations/requirements are too confusing	9	20.93%
Could not easily find information on licences	4	9.30%
Process was too complex	11	25.58%
Other	13	30.23%
None of the above	6	13.95%
Total	43	100%

Other Responses	# of Responses
Too many government agencies to go through	3
Process was too long	2
Catchment areas were unclear	1
Regulations are inconsistent and confusing	1

Question 5: Have you ever used the services of a Class A or B licensed abattoir?

Background

Class E licences are available only if a Class A or B licensed abattoir is not a viable option for services.

Why is this under consideration?

This question is being asked to determine if respondents had any experience with Class A or B abattoirs, and subsequently whether this experience might have influenced the decision to pursue a D or E licence.

Responses

55 percent of respondents had used a Class A or B licensed abattoir.

Responses	# of Responses	% of Responses
Yes	36	55.38%
No	29	44.62%
Total	65	100.00%

Question 6: Was there a particular reason you opted for a Class D or E licence instead of using a Class A or B abattoir? (Select all that apply)

Background

Class E licences are available only if a Class A or B licensed abattoir is not a viable option for services. In limited circumstances a Class A or B abattoir may be an option for an operator in a designated area.

Why is this under consideration?

This question is being asked to understand why applicants preferred to apply for a D or E licence rather than using a Class A or B licensed abattoir if it was available, and if there are any common themes across applicants.

Responses

33 percent of respondents indicated that Class A or B licensed abattoirs were too far away and 21 percent indicated they were too costly. As well, 21 percent of respondents indicated they prefer to do the slaughter themselves.

Responses	# of Responses	% of Responses
Class A or B is too far away	54	32.73%
Class A or B is too costly to use	36	21.82%
I prefer to do it myself	34	20.61%
Class A or B does not provide the slaughter I need	24	14.55%
Class A or B only operates seasonally	12	7.27%
None of the above	5	3.03%
Total	165	100.00%

Question 7: If you have decided to not pursue licensing, even with an accepted Class E feasibility study, please explain why:

Background

Some Class E applicants choose not to proceed with licensing even though they have a favorable feasibility study.

Why is this under consideration?

This question seeks to understand why applicants chose not to proceed with licensing when it was available.

Responses

Of those that responded, most were hesitant about licensing when they weighed the cost of establishing the operation against the risk of the licence not being approved again at the end of the licence period if a Class A or B opened up nearby.

Question 8: If your licence has expired and you chose not to apply for another licence, why did you choose not to re-apply? (Select all that apply)

Background

Class E licenses are available for up to 5 years. Once they expire, the applicant must re-apply to confirm if the need for a Class E licence still exists. There is no renewal process for Class E licences.

Why is this under consideration?

This question is being asked to understand why producers choose not to continue, and to see if there are any common themes that could inform improvements to the current system.

Responses

32 percent of respondents indicated that their reason was something other than the choices available in the survey. 23 percent of respondents indicated they felt there were too many restrictions, and 23 percent indicated the administrative requirements were too time consuming.

Responses	# of Responses	% of Responses
None of the above	7	31.82%
Too many restrictions	5	22.73%
The administrative requirements were too time consuming	5	22.73%
No interest in selling meat	3	13.64%
Licensing was too complex	2	9.09%
The Regional Health Authority visits were too frequent	0	0.00%
Total	22	100.00%

Question 9: In your experience, does your Class D or E licence provide you with adequate opportunity to access the market for meat products in your area? Please explain:

Background

Currently, Class D and E licences are able to sell restricted amounts of uninspected meat only in the regional district in which they are licensed.

Why is this under consideration?

The Ministry wants to learn more about the impact of licensing restrictions.

Responses

Most felt that the Class D and E licences provided adequate access to the market. Overall, most Class D licensees who responded were happier with the licences, while Class E licensees voiced concerns about not being able to sell to retail or outside the regional district.

Question 10: Right now, how familiar are you with the regulations about Class D and E licences?

Background

Class D and E licence requirements are established in the Meat Inspection Regulation, under the *Food Safety Act*.

Why is this under consideration?

The Ministry wants to know how accessible information in the Meat Inspection Regulation is to those who are regulated.

Responses

81 percent of respondents indicated they were either very familiar or familiar with the Meat Inspection Regulation.

Responses	# of Responses	% of Responses
Very Familiar/Familiar	52	81.25%
Neutral	9	14.06%
Very Unfamiliar/Unfamiliar	3	4.69%
Total	64	100.00%

Question 11: Under the Meat Inspection Regulation, an "animal unit" is 1,000lbs. How satisfied are you with the amount of animals you can slaughter per year, which is 10 animal units for an E licence or 25 animal units for a D licence?

Background

Under the Meat Inspection Regulation, Class D and E licences have production limits.

Why is this under consideration?

The Ministry would like to know if the current production limits are a matter of concern for operators.

Responses

Overall, 55 percent of respondents indicated they were either very satisfied or satisfied with the current production limits.

Responses	# of Responses	% of Responses
Very Satisfied/Satisfied	36	55.38%
Very Unsatisfied/Unsatisfied	22	33.85%
Neutral	7	10.77%
Total	65	100.00%

Question 12: If you answered "Unsatisfied" or "Very Unsatisfied" to Q11 – what limits would you think are acceptable? Please explain:

Background

Under the Meat Inspection Regulation, Class D and E licences are restricted to production limits of 10 animal units or 10,000lbs for a Class E licence and 25 animal units or 25,000lbs for a Class D licence.

Why is this under consideration?

The Ministry would like to know what limits would be seen as reasonable, given limited oversight and lack of on-site inspection.

Responses

Most respondents indicated that they would like the Class E production limits increased. Answers varied from increasing Class E licences to 20 units to Class E licences limits matching the limits of the Class D licences (25 animal units). Others felt that there should not be any limits, and the level of production should be related to risk and not volumes. Building off this, some indicated production amounts should be gradually increased based on compliance history.

Question 13: Do you think the animal units should be based on species type, rather than weight? (for example: 100 chickens, 10 cows)

Background

The current animal units are based on total combined weight, rather than species type. A Class E licence holder can slaughter 10,000lbs of combined animal weight per year, which could be made up of 2,500 chickens or 10 cows, or 2000 chickens and 5 cows, as long as the licence includes these species and their combined slaughter weight does not exceed 10,000lbs.

Why is this under consideration?

Limits expressed in terms of animal units may be unnecessarily confusing.

Responses

53 percent of respondents indicated they would prefer production limits expressed in terms of species.

Responses	# of Responses	% of Responses
Yes	32	53.33%
No	28	46.67%
Total	60	100.00%

Question 14: In order to be eligible for a Class E licence, the travel time to the nearest Class A or B slaughter facility must be greater than 2 hours. How satisfied are you with this policy?

Background

Current Ministry policy encourages producers to use a Class A or B facility when available to them. The current policy is to deny a Class E applicant if a Class A or B licensed abattoir that will provide required services is within 2 hours travel time.

Why is this under consideration?

The Ministry has heard specific concerns about this policy.

Responses

65 percent of respondents indicated that they were either very unsatisfied or unsatisfied with the current policy.

Responses	# of Responses	% of Responses
Very Satisfied/Satisfied	9	14.52%
Neutral	13	20.97%
Very Unsatisfied/Unsatisfied	40	64.52%
Total	62	100.00%

Question 15: What do you think is a reasonable travel time for bringing your animals to a Class A or B facility for slaughter? (Select all that apply)

Background

The current policy is to deny a Class E applicant if a Class A or B licensed abattoir that will provide required services is within 2 hours travel time.

Why is this under consideration?

The Ministry has heard specific concerns about this policy.

Responses

Nearly 80 percent of respondents said that under an hour is a reasonable time to transport animals.

Responses	# of Responses	% of Responses
Under 15 minutes away	15	19.48%
16-30 minutes away	21	27.27%
31-60 minutes away	26	33.77%
61-90 minutes away	8	10.39%
91-120 minutes away	5	6.49%
120+ minutes away	2	2.60%
Total	77	100.00%

Question 16: In your area, does winter weather make transportation of animals more challenging?

Background

Current Class E feasibility study currently takes into consideration transportation difficulties, such as regular road closures or marine travel.

Why is this under consideration?

The Class E feasibility study currently only considers seasonal difficulties as a regular closure of a road. It does not take into consideration occasional weather related closures or the increased travel time due to inclement weather.

Responses

84 percent of respondents indicated that winter weather in their area makes transport of animals more challenging.

Responses	# of Responses	% of Responses
Yes	54	84.38%
No	10	15.63%
Total	64	100.00%

Question 17: With an E licence, meat sales are restricted to within the regional district in which the slaughter establishment is located. These sales can only take place at the farm gate and at farmers markets. How satisfied are you with this regulation?

Background

The Meat Inspection Regulation requires that meat from a Class D or E facility must only be sold within the same regional district as the Class D or E licensed facility. As well, Class E licensees are only allowed to sell at farmers markets and at the farm-gate.

Why is this under consideration?

The Ministry has heard some concerns about this specific policy.

Responses

44 percent of respondents said they were either very unsatisfied or unsatisfied. 43 percent of respondents said they were very satisfied or satisfied.

Responses	# of Responses	% of Responses
Very Satisfied/Satisfied	27	42.86%
Neutral	8	12.70%
Very Unsatisfied/Unsatisfied	28	44.44%
Total	63	100.00%

Question 18: If you answered "Unsatisfied" or "Very Unsatisfied" to Q17, please indicate why: (Select all that apply)

Background

The Meat Inspection Regulation requires that meat from a Class D or E facility must only be sold within the same regional district as the Class D or E licensed facility. As well, Class E licensees are only allowed to sell at farmers markets and at the farm-gate.

Why is this under consideration?

The Ministry is looking for specific feedback on this policy.

Responses

45 percent of respondents said that Class E licences should allow sales to retail outlets, while 55 percent of respondents thought Class E should allow sales outside the regional district.

Responses	# of Responses	% of Responses
Class E licence should allow sales to retail outlets	18	45.00%
Class E should allow sales outside regional district	22	55.00%
None of the above	6	15.00%
Total	40	100.00%

Question 19: Would you be willing to agree with increased regulatory requirements for food safety and animal welfare, including more training, if more Class E licences were allowed?

Background

In order to balance local food production needs with food safety and animal welfare standards, Class D and E licences are subject to restrictions.

Why is this under consideration?

Increasing food safety and animal welfare requirements could be an option for balancing potential risks of uninspected slaughter in Class E facilities.

Responses

Over 70 percent of respondents indicated that they would be willing to accept more requirements if restrictions on Class E licences were reduced.

Responses	# of Responses	% of Responses
Yes	43	70.49%
No	18	29.51%
Total	61	100.00%

Question 20: How satisfied are you with the current record keeping requirements?

Background

Under the Meat Inspection Regulation, Class D and E licensees must keep records about the ownership of animals that enter their slaughter facilities.

Why is this under consideration?

The Ministry wants to know if this requirement is a challenge for licensees.

Responses

61 percent of respondents indicated they are either very satisfied or satisfied with the record keeping requirements.

Responses	# of Responses	% of Responses
Very Satisfied/Satisfied	38	61.29%
Neutral	18	29.03%
Very Unsatisfied/Unsatisfied	6	9.68%
Total	62	100.00%

Question 21: Class D licences are only available in designated rural areas as specified in the Meat Inspection Regulation, under the *Food Safety Act*. Should more areas be designated?

Background

Currently Class D licences are only available in 10 districts based on: low population density, low animal production levels; unlikely for Class A or B facility to open.

Why is this under consideration?

Some producers have suggested that more areas should be designated.

Responses

87 percent of respondents indicated that more areas should be designated.

Responses	# of Responses	% of Responses
Yes	47	87.04%
No	7	12.96%
Total	54	100.00%

Question 22: If you answered “Yes” to Q21, please explain:

Background

Currently Class D licences are only available in 10 designated districts.

Why is this under consideration?

The Ministry would like to learn more about respondent’s concerns/suggestions regarding designated districts for Class D licences.

Responses

Overall the common themes in the responses to this question dealt with concerns about restrictions on selling local meat and benefits to the local economy. Some indicated that this option would reduce travel time and place less stress on animals. There were also concerns about limited availability of meat cutters.

Question 23: How satisfied are you with the on-going communication from your Regional Health Authority about the status of the program, current issues and general information?

Background

RHAs currently administer Class D and E, including licensing, inspections and enforcement.

Why is this under consideration?

The Ministry would like to learn from licensees about their relationship with the RHAs.

Responses

44 percent of respondents indicated they are either very satisfied or satisfied with the communication from their RHA.

Responses	# of Responses	% of Responses
Very Satisfied/Satisfied	28	43.75%
Neutral	18	28.13%
Very Unsatisfied/Unsatisfied	18	28.13%
Total	64	100.00%

Question 24: How satisfied are you with the level of regulatory oversight currently provided by your Regional Health Authority?

Background

RHAs currently administer the Class D and E, including licensing, inspections and enforcement.

Why is this under consideration?

The Ministry would like to learn from licensees about their relationship with the RHAs.

Responses

56 percent of respondents indicated they were either very satisfied or satisfied with the level of regulatory oversight from their RHA.

Responses	# of Responses	% of Responses
Very Satisfied/Satisfied	35	56.45%
Neutral	15	24.19%
Very Unsatisfied/Unsatisfied	12	19.35%
Total	62	100.00%

Question 25: Should there be more, the same number, or fewer on-site visits?

Background

RHAs currently administer Class D and E, including licensing, inspections and enforcement.

Why is this under consideration?

The Ministry would like to learn more about the frequency of on-site visits.

Responses

72 percent of respondents indicated that there should be the same amount of on-site visits from the RHAs.

Responses	# of Responses	% of Responses
More Visits	11	19.30%
Same Amount of Visits	41	71.93%
Less Visits	5	8.77%
Total	57	100.00%

Question 26: How many times has an Environmental Health Officer from the Regional Health Authority inspected/visited your slaughter facility within the last 12 months?

Background

Environmental Health Officers (EHOs) conduct on-site inspections of Class D and E facilities.

Why is this under consideration?

Given that RHAs are independent of each other, the Ministry would like to know more about the frequency of on-site inspections at Class D and E facilities. Only current licence holder's responses were included.

Responses

52 percent of current Class D and E licensees indicated they received one visit from their EHO in the past year.

Responses	# of Responses	% of Responses
0 times	7	33.33%
1 time	11	52.38%
2 times	2	9.52%
3 times	1	4.76%
4 or more times	0	0.00%
Total	21	100.00%

Question 27: How satisfied are you with the current labeling requirements regarding meat products originating from Class D and E facilities?

Background

Under the Meat Inspection Regulation, Class D and E licences must label all meat products they produce in their facilities as “Not Government Inspected.”

Why is this under consideration?

The Ministry wants to learn more about the impact of labelling requirements on producers.

Responses

67 percent of respondents indicated they were either very satisfied or satisfied with the labelling requirements.

Responses	# of Responses	% of Responses
Very Satisfied/Satisfied	43	67.19%
Neutral	18	28.13%
Very Unsatisfied/Unsatisfied	3	4.69%
Total	64	100.00%

Question 28: How satisfied are you with the current SlaughterSafe course administered by the Regional Health Authority?

Background

To ensure Class D and E licensees have sufficient training in food safety and animal welfare, they are required to take a SlaughterSafe course prior to getting a licence. The course teaches slaughter, animal welfare and food safety practices, and is administered by the RHAs.

Why is this under consideration?

The Ministry is interested specifically about Class D and E licensees experiences with the SlaughterSafe course and if any additional training or less training should be considered.

Responses

65 percent of respondents indicated they were either very satisfied or satisfied with the SlaughterSafe course.

Responses	# of Responses	% of Responses
Very Satisfied/Satisfied	40	64.52%
Neutral	15	24.19%
Very Unsatisfied/Unsatisfied	7	11.29%
Total	62	100.00%

Question 29: In your experience, should there be more, the same amount, or less training for Class D and E licensees?

Background

Currently, the training for Class D and E licensees is administered by the RHA and consists of one SlaughterSafe course.

Why is this under consideration?

The Ministry wants to know more about the level of training required.

Responses

62 percent of respondents indicated there should be no change to the amount of training.

Responses	# of Responses	% of Responses
More Training	24	38.10%
Same Amount of Training	39	61.90%
Less Training	0	0.00%
Total	63	100.00%

Question 30: Finally, we would like to give you the opportunity to provide any general comments and observations about your experience relating to Class D and E licences.

Background

There has been no formal consultation since Class D and E licences were introduced in 2011.

Why is this under consideration?

This question is an opportunity to provide thoughts, concerns, and comments about the Class D and E licences that may not be captured in the survey already.

Responses

The responses to this question varied widely. Common themes include:

Too many government agencies: A large portion of the respondents indicated that they would prefer the Class D and E licences to be completely administered by the Ministry of Agriculture. Some noted that EHOs were not trained properly to inspect slaughter, and that information delivered to farmers is inconsistent across RHAs. Many mentioned that having one agency would streamline the process, and improve oversight.

Enforcement: Respondents indicated concerns over enforcement, and for the need for more inspection options for Class D and E licensees. Some suggested annual inspections, or mobile inspectors to witness slaughtering.

Travel time/animal welfare: Many noted that Class D and E licences reduce travel times which also reduce stress on animals by slaughtering on-farm and that this should be taken into consideration. Several noted that meat tastes better when the animal is less stressed.

Training: Some respondents thought increased training would be helpful, with more training required for new producers.

Insurance: Others noted that insurance rates were high and insurance was difficult to find due to the nature of uninspected meat.

Several respondents also voiced suggestions for improvements. These included: having mobile inspectors on-site, designating veterinarians as inspectors, increasing use of mobile abattoirs, expanding eligibility of Class E to every farmer in BC, and using a risk-based licensing system for Class D and E licences whereby after a certain time period and after passing a certain number of inspections one would graduate to a higher production limit.

Responses from Regional Health Authorities

Question 1: Under the Meat Inspection Regulation, an “animal unit” is 1,000lbs. How satisfied are you with the amount of animals Class D and E licensees can slaughter per year, which is 10 animal units for an E licence or 25 animal units for a D licence?

Background

Under the Meat Inspection Regulation, Class D and E licences have production limits.

Why is this under consideration?

The Ministry would like to know if the current production limits are a matter of concern for RHAs.

Responses

80 percent of RHAs indicated they were either very satisfied or satisfied with the limits.

Responses	# of Responses	% of Responses
Very Satisfied/Satisfied	4	80.00%
Neutral	1	20.00%
Very Unsatisfied/Unsatisfied	0	0.00%
Total	5	100.00%

Question 2: If you answered "Unsatisfied" or "Very Unsatisfied" to Q1 – what limits would you think are acceptable and why?

Background

Class D and E licences are restricted to production limits of 10 animal units or 10,000lbs for a Class E licence, and 25 animal units or 25,000lbs for a Class D licence.

Why is this under consideration?

The Ministry would like to know what limits would be seen as reasonable, given limited oversight and lack of on-site inspection.

Responses

The RHAs that answered indicated that the limits are a policy decision and that it is hard to monitor the actual production of the Class D and E licensees due to the current level of enforcement.

Question 3: Within the last 12 months, has each Class D and E facility within your Regional Health Authority been inspected on-site at least once by an Environmental Health Officer?

Background

There is no required level of inspection for RHAs; RHAs manage inspection frequency on an individual basis.

Why is this under consideration?

The Ministry would like to learn more about frequency of on-site inspections by RHAs.

Responses

100 percent of RHAs indicated that every Class D and E facility has not been inspected in the past year.

Responses	# of Responses	% of Responses
Yes	0	0.00%
No	5	100.00%
Total	5	100.00%

Question 4: If "No", how often is each Class D and E facility inspected?

Background

There is no required level of inspection for RHAs; RHAs manage inspection frequency on an individual basis.

Why is this under consideration?

The Ministry would like to learn more about frequency of on-site inspections by RHAs.

Responses

All RHAs stated that inspections frequency was on a risk based approach, with some facilities getting multiple visits per year and some only getting yearly or semi-annual visits, rather than a set timeframe.

Responses	# of Responses	% of Responses
Every two years	0	0.00%
Not every facility is inspected on a regular time period (i.e. done on an as-needed basis)	0	0.00%
Other	5	100.00%
Total	5	100.00%

Question 5: How many of these inspections resulted in regulatory corrective actions?

Background

There is no required level of inspection for RHAs; RHAs manage inspection frequency on an individual basis.

Why is this under consideration?

The Ministry would like to know more about the frequency of corrective actions.

Responses

Of those RHAs that responded, 100 percent said the inspections resulted in 1-5 corrective actions.

Responses	# of Responses	% of Responses
1 - 5	3	100.00%
6-10	0	0.00%
11-15	0	0.00%
15-20	0	0.00%
Over 20	0	0.00%
Total	3	100.00%

Question 6: In your experience, do you find the frequency of on-site inspections in your Regional Health Authority sufficient?

Background

There is no required level of inspection for RHAs; RHAs manage inspection frequency on an individual basis.

Why is this under consideration?

The Ministry would like feedback from the RHAs on the current frequency of on-site inspections.

Responses

Responses	# of Responses	% of Responses
Yes	2	50.00%
No	2	50.00%
Total	4	100.00%

Question 7: In your experience, should there be more, the same number, or fewer on-site inspections?

Background

There is no required level of inspection for RHAs; RHAs manage inspection frequency on an individual basis.

Why is this under consideration?

The Ministry would like feedback from the RHAs on the sufficiency of the number of on-site visits.

Responses

40 percent said there should be more visits. 40 percent said there should be the same amount of visits. 20 percent said there should be fewer visits.

Responses	# of Responses	% of Responses
More	2	40.00%
Same	2	40.00%
Less	1	20.00%
Total	5	100.00%

Question 8: Do you believe the current SlaughterSafe course - as administered by the Regional Health Authority - is providing the Class D and E licensees with sufficient food safety knowledge to operate an establishment?

Background

To ensure Class D and E licensees have sufficient training in food safety and animal welfare, they are required to take a SlaughterSafe course prior to getting a licence. The course teaches slaughter, animal welfare and food safety practices, and is administered by the RHAs.

Why is this under consideration?

The Ministry is interested specifically about RHAs' thoughts about the SlaughterSafe course and if there needs to be additional training or less training required.

Responses

80 percent of the RHAs indicated that the SlaughterSafe course was providing Class D and E licences with sufficient food safety knowledge.

Responses	# of Responses	% of Responses
Yes	4	80.00%
No	1	20.00%
Total	5	100.00%

Question 9: Do you think the BC Meat Inspection Code of Practice for Class D and E facilities should be mandatory?

Background

The draft Meat Inspection Code of Practice for Class D and E facilities is available but has not been formally adopted.

Why is this under consideration?

The Ministry wants to know if RHAs believe that adopting a Code of Practice for Class D and E facilities would be a benefit.

Responses

All RHAs indicated that they thought the BC Meat Inspection Code of Practice for Class D and E facilities should be mandatory.

Responses	# of Responses	% of Responses
Yes	5	100.00%
No	0	0.00%
Total	5	100.00%

Question 10: In your experience, are licensees of Class D and E facilities utilizing all the existing resources provided to them by the Environmental Health Officer?

Background

EHOs deliver compliance and enforcement for RHAs. EHOs also answer questions and provide information to Class D and E licensees.

Why is this under consideration?

The Ministry wants to know if Class D and E licensees are utilizing all the available resources that are provided through their EHOs.

Responses

Sixty percent of RHAs indicated that Class D and E licensees were not utilizing all the available resources provided to them.

Responses	# of Responses	% of Responses
Yes	2	40.00%
No	3	60.00%
Total	5	100.00%

Question 11: How is the current Class D and E Code of Practice being used in your Regional Health Authority? Please explain:

Background

The draft Meat Inspection Code of Practice for Class D and E facilities is available but has not been formally adopted.

Why is this under consideration?

The document is available to RHAs but is not mandatory. The Ministry is interested to know if RHAs are using the document.

Responses

Most of the RHAs indicated that the Class D and E Code of Practice is provided to applicants as a resource for building and operating their facility. One RHA indicated that they use the Code of Practice during site assessments and inspections.

Question 12: At current resource levels, how many more D and/or E facilities could be adequately administered/inspected within your geographical region/district?

Background

The majority of the resources to administer Class D and E licences come from the RHAs.

Why is this under consideration?

The Ministry would like to know if the RHAs have capacity to administer more Class D or E facilities.

Responses

60 percent of RHAs indicated they could not administer more D or E licences at current resource levels, while 40 percent indicated they could administer 5-10 more.

Responses	# of Responses	% of Responses
0	3	60.00%
1-2	0	0.00%
3-5	0	0.00%
5-10	2	40.00%
>10	0	0.00%
Total	5	100.00%

Question 13: Within the last 12 months, how many public complaints have you received regarding Class D and E slaughter facilities?

Background

As the administrator, an RHA may receive public complaints about Class D and E facilities.

Why is this under consideration?

The Ministry would like to learn more about the volume of public complaints received.

Responses

60 percent of RHAs received no public complaints, while 40 percent received between 1-5 complaints in the past 12 months.

Responses	# of Responses	% of Responses
0	3	60.00%
1-5	2	40.00%
6-10	0	0.00%
11-15	0	0.00%
15-20	0	0.00%
Over 20	0	0.00%
Total	5	100.00%

Question 14: What was the nature of the complaints? (Select all that apply)

Background

As the administrator, an RHA may receive public complaints about Class D and E facilities.

Why is this under consideration?

The Ministry would like to know more about the nature of public complaints received.

Responses

57 percent of the complaints were about food safety and animal welfare issues. One RHA received a complaint about sales outside the regional district.

Response	# of Responses	% of Responses
Food Safety issues	2	28.57%
Animal Welfare issues	2	28.57%
Labelling issues	1	14.29%
Quality of Service Received	1	14.29%
Other issues:		
Selling outside the regional district	1	14.29%
Total	7	100.00%

Question 15: Does the Regional Health Authority receive queries from the general public about which farms are licensed as either Class D or Class E?

Background

As the administrator, an RHA may receive questions from the public about Class D and E facilities.

Why is this under consideration?

The Ministry would like to know more about the nature of questions received from the public.

Responses

All RHAs indicated they receive queries from the general public about which farms are licensed as either Class D or E.

Responses	# of Responses	% of Responses
Yes	5	100.00%
No	0	0.00%
Total	5	100.00%

Question 16: If yes, how often? (Select the best fit)

Background

As the administrator, an RHA may receive questions from the public about Class D and E facilities.

Why is this under consideration?

The Ministry would like to know more about the nature of questions received from the public.

Responses

60 percent of RHAs indicated that they receive between 1-3 queries per year about which farms are licensed as Class D or E.

Responses	# of Responses	% of Responses
More than 3 per week	0	0.00%
1-3 per week	0	0.00%
1 per week	0	0.00%
More than 3 per month	0	0.00%
1-3 per month	0	0.00%
1 per month	1	20.00%
More than 3 per year	0	0.00%
1-3 per year	3	60.00%
1 per year	1	20.00%
Total	5	100.00%

Question 17: Is licensee information available to the general public in regards to Class D or Class E licensees?

Background

All Class A and B facilities have their information posted publicly on the Ministry website. RHAs can post similar information at their discretion.

Why is this under consideration?

The Ministry would like to know if Class D and E licence information is available to the general public.

Responses

60 percent of RHAs indicated that licence information is available to public. Context is provided in question 17.

Responses	# of Responses	% of Responses
Yes	3	60.00%
No	2	40.00%
Total	5	100.00%

Question 18: If yes, where?

Background

All Class A and B facilities have their information posted publically on the Ministry website. RHAs can post similar information at their discretion.

Why is this under consideration?

The Ministry would like to know more about how Class D and E licensee information is made available to the public.

Responses

All RHAs indicated that licence information is available through a Freedom of Information (FOI) request. Some RHAs indicated that FOI requests classified the information as publicly available and some did not. One RHA indicated that licence information is available without an FOI request.

Question 19: Are Class D and Class E inspection reports available to the general public (such as the Regional Health Authority's restaurant safety rating service)?

Background

Most RHAs post inspection reports for Food Premises, Residential Care Facilities and other types of establishments on their websites in a searchable database.

Why is this under consideration?

The Ministry would like to know if any RHAs post Class D and E inspection reports on their websites.

Responses

All RHAs indicated that the Class D and E inspections reports are not publically available.

Responses	# of Responses	% of Responses
Yes	0	0.00%
No	5	100.00%
Total	5	100.00%

Question 20: If yes, where?

Due to the answer in question 19, this question is not applicable.

Question 21: How many Class D licensing requests did you receive in the past year?

Background

The Ministry does not receive Class D licensing requests which go directly to RHAs.

Why is this under consideration?

The Ministry wants to know how many Class D licensing requests RHAs receive.

Responses

RHAs that are not in designated areas did not respond. Of those that responded, a majority of the RHAs received between 1-2 licensing requests. One RHA received 10 licensing requests in the past year.

Question 22: Of these requests, how many Class D applicants completed the application and training process?

Background

The Ministry does not receive Class D licensing requests which go directly to RHAs.

Why is this under consideration?

The Ministry would like to know how many Class D proponents completed the application and training process.

Responses

All Class D licensing requests in the past year completed the application and training process.

Question 23: What approach does the Regional Health Authority use to ensure that Class D or Class E licensees are not exceeding the slaughter allowances provided by this type of licence?

Background

Under the Meat Inspection Regulation, Class D and E licences are restricted to production limits of 10 animal units or 10,000lbs for a Class E licence and 25 animal units or 25,000lbs for a Class D licence. These levels take into account the limited oversight and lack of on-site inspection during slaughter.

Why is this under consideration?

The Ministry would like to know how each RHA enforces slaughter limits.

Responses

All RHAs indicated that they take a risk-based approach to enforcement. Some review records during inspections and licence re-applications, while others encourage education. All of them indicated that their enforcement is complaint-driven.

Question 24: Are you satisfied with the on-going communication from the Province about the status of the program, current issues and general information?

Background

The Ministry has delegated administration, licensing and enforcement to RHAs. RHAs also derive authority from Ministry of Health's legislation.

Why is this under consideration?

The Ministry would like to know more about the sufficiency of communication from the provincial government.

Responses

Some RHAs indicated that they were satisfied with the level of communication from the Province. Other RHAs indicated that they would like more regular communications and revised materials to provide as resources for Class D and E applicants.

Question 25: Do you feel there is sufficient support from the Province to administer the Class D and E licences?

Background

The Ministry has delegated administration, licensing and enforcement to RHAs. RHAs also derive authority from Ministry of Health's legislation.

Why is this under consideration?

The Ministry would like to know more from RHAs about how well supported they are with respect to Class D and E licensing.

Responses

Overall, 60 percent of RHAs do not feel there is sufficient support from the Province to administer the Class D and E licences.

Responses	# of Responses	% of Responses
Yes	2	40.00%
No	3	60.00%
Total	5	100.00%

Question 26: Do you have suggestions for improving the Province's communication with you?

Background

The Ministry would like to know more about the sufficiency of communication from the provincial government.

Why is this under consideration?

The Ministry would like feedback on how to improve communication between RHAs and the provincial government pertaining to the Class D and E licences.

Responses

RHAs suggestions on how to improve communication included procedural changes, such as the Ministry alerting the RHA when a Class E feasibility study comes in, and establishing joint training with Ministry inspectors. RHAs suggested more regular email updates from the Province on the program.

Question 27: Are there topics about which you would prefer more communication?

Background

The Ministry has delegated administration, licensing and enforcement to RHAs. RHAs also derive authority from Ministry of Health's legislation.

Why is this under consideration?

The Ministry would like specific feedback on topics of interest for RHAs.

Responses

RHAs indicated that they would like more regular updates on the status of the entire Meat Inspection Program, a summary of issues, as well as issues that are happening in other RHAs. One RHA indicated that they would like notification when the Ministry receives a Class E feasibility study.

Question 28: Finally, we would like to give you the opportunity to provide any general comments and observations about your experience relating to Class D and E licences.

Background

There has been no formal consultation since Class D and E licences were introduced in 2011.

Why is this under consideration?

This question is an opportunity to provide thoughts, concerns, and comments about the Class D and E licences that may not be captured in the survey already.

Responses

Some RHAs indicated that they would like to see more on-site inspections including test-kills while other RHAs commented that they had limited issues with the program. Other comments included the need for more resources to administer the program.

Responses from Industry Associations

Note: BC Cattlemen’s Association, BC Association of Abattoirs, the BC Sheep Federation and the Small Scale Meat Producers Association (SSMPA) each made a single submission representing the views of their collective membership. SSMPA also provided individual submissions from some of their members. In order to the balance this variation, the analysis distinguishes between industry associations and industry members.

One regional district submitted a response and has been captured under the “Industry Associations” heading because it is the most suitable category.

Question 1: How familiar are you with the Class D and E licences?

Background

Class D and E licences were introduced in 2011. The licensing process has changed little since the Meat Inspection Program responsibility transferred from the Ministry of Health to the Ministry of Agriculture in 2012. RHAs licence Class D and coordinate with the Ministry on review of the feasibility study for Class E licensing.

Why is this under consideration?

This question looks to understand how familiar the industry respondents are with Class D and E licences.

Responses

All of the industry associations and 91 percent of SSMPA members indicated they were either very familiar or familiar with Class D and E licences.

Industry Associations			SSMPA Members		
Responses	# of Responses	% of Responses	Responses	# of Responses	% of Responses
Very Familiar/ Familiar	5	100.00%	Very Familiar/ Familiar	10	90.91%
Neutral	0	0.00%	Neutral	0	0.00%
Very Unfamiliar/ Unfamiliar	0	0.00%	Very Unfamiliar/ Unfamiliar	1	9.09%
Total	5	100.00%	Total	11	100.00%

Question 2: Do you have any concerns about Class D and E licences currently?

Background

The industry respondents represent many different interests. Their input on the potential impact of Class D and E licences will contribute to a more balanced perspective.

Why is this under consideration?

The Ministry would like to learn about the perspective of all stakeholders in the industry regarding Class D and E licences.

Responses

All industry associations and 91 percent of SSMPA members indicated they have concerns about the Class D and E licences (reasons for responses are captured in the next question).

Industry Associations			SSMPA Members		
Responses	# of Responses	% of Responses	Responses	# of Responses	% of Responses
Yes	5	100.00%	Yes	10	90.91%
No	0	0.00%	No	1	9.09%
Total	5	100.00%	Total	11	100.00%

Question 3: If you answered "Yes" to Q2, please explain:

Background

The industry respondents represent many different interests. Their perspective on the potential impact of Class D and E licences could be informative.

Why is this under consideration?

The Ministry would like to learn about the perspective of all stakeholders in the industry regarding Class D and E licences.

Responses

Industry associations had concerns about food safety and animal welfare, consistency of regulations, lack of oversight, and enforcement. Some noted their belief that while Class A and B abattoirs have no capacity to provide service, but Class D and E licences are not available as an alternative to some of their members. Industry associations also voiced concerns with inconsistency and lack of clarity resulting from having to deal with multiple government agencies.

The responses from the SSMPA members included the following themes: Class D and E licences are too hard to get, the regulations are too restrictive and costly, time restrictions on licences are prohibitive to licensing, and too many government agencies involved makes the process confusing. Many SSMPA members indicated they would like to see the designated areas expanded, and had concerns about the two hour policy.

Question 4: Right now, how familiar are you with the regulations about Class D and E licences?

Background

Class D and E licence requirements are outlined in the Meat Inspection Regulation, under the *Food Safety Act*.

Why is this under consideration?

The Ministry wants to know how accessible information in the Meat Inspection Regulation is to the sector.

Responses

All industry associations and 91 percent of SSMPA members indicated they were either very familiar or familiar with the Meat Inspection Regulation.

Industry Associations			SSMPA Members		
Responses	# of Responses	% of Responses	Responses	# of Responses	% of Responses
Very Familiar/ Familiar	5	100.00%	Very Familiar/ Familiar	10	90.91%
Neutral	0	0.00%	Neutral	0	0.00%
Very Unfamiliar/ Unfamiliar	0	0.00%	Very Unfamiliar/ Unfamiliar	1	9.09%
Total	5	100.00%	Total	11	100.00%

Question 5: Under the Meat Inspection Regulation, an animal unit is 1,000lbs. How satisfied are you with the amount of animals D and E licensees can slaughter per year (E 10 animal units, D 25 animal units).

Background

Under the Meat Inspection Regulation, Class D and E licences have production limits.

Why is this under consideration?

The Ministry would like to know if the current production limits are a matter of concern for industry respondents.

Responses

60 percent of the industry associations and 73 percent of SSMPA members indicated they are either very unsatisfied or unsatisfied with the current Class D and E licence production limits.

Industry Associations			SSMPA Members		
Responses	# of Responses	% of Responses	Responses	# of Responses	% of Responses
Very Satisfied/ Satisfied	1	20.00%	Very Satisfied/ Satisfied	1	9.09%
Neutral	1	20.00%	Neutral	2	18.18%
Very Unsatisfied/ Unsatisfied	3	60.00%	Very Unsatisfied/ Unsatisfied	8	72.73%
Total	5	100.00%	Total	11	100.00%

Question 6: If you answered "Unsatisfied" or "Very Unsatisfied" to Q5 – what limits would you think are acceptable and why?

Background

Under the Meat Inspection Regulation, Class D and E licences are restricted to production limits of 10 animal units or 10,000lbs for a Class E licence and 25 animal units or 25,000lbs for a Class D licence.

Why is this under consideration?

The Ministry would like to know what limits would be seen as reasonable, given limited oversight and lack of on-site inspection.

Responses

Concerns were related to the lack of oversight, with the risk of food-borne illness outbreaks resulting from uninspected meat. Some industry associations indicated that the limits themselves are not the issue, but rather the limits should be determined on a risk basis. Others argued that limits are too low to allow farmers to make an adequate living.

SSMPA members indicated that the limits should be flexible to each producer and rely on certain parameters to set the limits. Other SSMPA members indicated they would like on-site inspection to ensure animal welfare and food safety. Specifically, most SSMPA members indicated the limits should be increased.

Question 7: Do you think the animal units should be based on species type, rather than weight? (for example: 100 chickens, 10 cows)

Background

The current animal units are based on total combined weight, rather than species type. A Class E licence holder can slaughter 10,000lbs of combined animal weight per year, which could be made up of 2,500 chickens or 10 cows, or 2000 chickens and 5 cows, as long as the licence includes these species and their combined slaughter weight does not exceed 10,000lbs.

Why is this under consideration?

Limits expressed in terms of animal units may be unnecessarily confusing.

Responses

All industry associations and 82 percent of SSMPA members indicated that the current animal units should be based on species type rather than weight.

Industry Associations			SSMPA Members		
Responses	# of Responses	% of Responses	Responses	# of Responses	% of Responses
Yes	4	100.00%	Yes	9	81.82%
No	0	0.00%	No	2	18.18%
Total	4	100.00%	Total	11	100.00%

Question 8: Are you satisfied with the level of regulatory oversight currently provided by the Regional Health Authorities?

Background

RHAs currently administer Class D and E, including licensing, inspections and enforcement.

Why is this under consideration?

The Ministry would like to learn more about the perspective of other industry stakeholders.

Responses

All industry associations indicated they are not satisfied with the level of regulatory oversight provided by the RHAs. 55 percent of SSMPA respondents indicated they were satisfied with the level of oversight provided by the RHAs.

Industry Associations			SSMPA Members		
Responses	# of Responses	% of Responses	Responses	# of Responses	% of Responses
Yes	0	0.00%	Yes	6	54.55%
No	4	100.00%	No	5	45.45%
Total	4	100.00%	Total	11	100.00%

Question 9: If you answered "No" to Q8, please explain:

Background

RHAs currently administer Class D and E, including licensing, inspections and enforcement.

Why is this under consideration?

The Ministry would like to learn more about the perspective of other industry stakeholders.

Responses

Several industry associations voiced concerns that EHOs are not trained meat inspectors, and the majority of the industry associations indicated they would prefer the licences to be administered by one government agency. The industry associations also indicated that on-site inspections by trained meat inspectors would be preferable. The SSMPA members also shared the concern about the multiple government agencies involved in the Class D and E licences.

Question 10: Do you think Class D and E licensees would benefit from more training? For example, training in humane slaughter, best practices or response to outbreaks?

Background

To ensure Class D and E licensees have sufficient training in food safety and animal welfare, they are required to take a SlaughterSafe course prior to getting a licence. The course teaches slaughter, animal welfare and food safety practices, and is administered by the RHAs.

Why is this under consideration?

The Ministry is interested specifically if the industry respondents think the SlaughterSafe course is sufficient training for Class D and E licensees and if there needs to be any additional training or less training.

Responses

All of the industry associations and all SSMPA members said that Class D and E licensees would benefit from increased training requirements.

Industry Associations			SSMPA Members		
Responses	# of Responses	% of Responses	Responses	# of Responses	% of Responses
Yes	5	100.00%	Yes	10	100.00%
No	0	0.00%	No	0	0.00%
Total	5	100.00%	Total	11	100.00%

Question 11: If Class D and E licensees were subject to more regulatory oversight, would you agree that more Class D and E licences should be allowed?

Background

In order to balance local food production with food safety, Class D and E licences are subject to restrictions.

Why is this under consideration?

Increasing food safety and animal welfare requirements could be an option for balancing the potential risks of uninspected slaughter in Class E facility.

Responses

80 percent of industry associations and all SSMPA members indicated they would support more Class D and E licences with increased regulatory oversight.

Industry Associations			SSMPA Members		
Responses	# of Responses	% of Responses	Responses	# of Responses	% of Responses
Yes	4	80.00%	Yes	9	100.00%
No	1	20.00%	No	0	0.00%
Total	5	100.00%	Total	9	100.00%

Question 12: Class D licences are only available in designated rural areas as specified in the Meat Inspection Regulation, under the *Food Safety Act*. Should more areas be designated? Please explain.

Background

Currently Class D licences are only available in 10 districts based on: low population density, low animal production levels; unlikely for Class A or B facility to open.

Why is this under consideration?

Some producers have suggested that more areas should be designated.

Responses

The range of responses included: no more areas should be designated; Class D licences should be on a case-by-case basis; Class D licences should be available Province-wide.

Some industry associations indicated that no more areas should be designated due to concerns about the risks of uninspected meat, and that all slaughter should require the presence of an inspector. They also indicated that if more areas are designated, regulatory requirements for food safety and animal welfare should be strengthened.

Other industry associations indicated that regulatory compliance is costly, but all licences should be subject to the same standards of food safety and animal welfare, with equal consideration given to issues of education and economic development. Some industry associations indicated that designating more areas would reduce (presumed) capacity problems at Class A and B facilities, allow producers to sell to wholesale buyers and support local economies, reduce costs for local producers and reduce transport/stress on animals.

A majority of the SSMPA members indicated that Class D licences should be available throughout the Province. Specific concerns included: high costs of using Class A and B facilities; transportation difficulties (i.e. mountain passes, winter weather) and Class A or B does not process the animals the way they prefer.

Question 13: Finally, we would like to give you the opportunity to provide any general comments and observations about your experience relating to Class D and E licences.

Background

There has been no formal consultation since Class D and E licences were introduced in 2011.

Why is this under consideration?

This question is an opportunity to provide thoughts, concerns, and comments about the Class D and E licences that may not be captured in the survey tool already.

Responses

Some industry associations voiced concerns over compliance and enforcement, food safety, animal welfare and consumer confidence. Some concerns centered on the competition with and potential loss of business for licensed Class A and B abattoirs, and worries that Class D and E licensees do not have an inspector present during slaughter and therefore have less incentive to maintain appropriate food safety and animal welfare standards. Industry associations also voiced concerns that the regulations are preventing economic growth by restricting small businesses, and voiced concerns over coordination between the Ministry of Health and the Ministry of Agriculture in the administration of provincial meat inspection.

Other industry associations indicated that the Class E applicant's proximity to Class A or B facilities should not be a factor in on-farm slaughter and the risk of non-renewal is prohibitive to licensing.

A common theme across several industry associations and SSMPA members was the need to increase the level of training and resources for all licence holders to improve animal welfare, food safety and consumer confidence.

SSMPA members voiced concerns related to the lack of abattoirs and the transport of animals. Others indicated that farmers who wish to, and demonstrate that they can slaughter safely, should be able to do so regardless of other restrictions. Other SSMPA members voiced concerns about the risks of uninspected meat.

Conclusion

This consultation was launched as a part of a review of the province's rural slaughter capacity by the Ministry to support BC meat production, ranchers and livestock producers. From March to April 2018, the Ministry received feedback and suggestions on rural slaughter licensing from stakeholders through a confidential survey. The Ministry would like to thank everyone who provided input into this consultation; your comments are greatly appreciated and will contribute to a more informed review.

Appendix 1: Survey data

Note: All the survey comments have been reviewed to safeguard privacy. In order to ensure this, some comments have been either fully or partially redacted due to privacy concerns.

Responses from Class D and E applicants

Question 1: What months do you typically slaughter your animals?

Red Meat			Poultry		
Month	# of Responses	% of Responses	Month	# of Responses	% of Responses
January	20	7.55%	January	1	0.97%
February	17	6.42%	February	0	0.00%
March	15	5.66%	March	1	0.97%
April	15	5.66%	April	4	3.88%
May	14	5.28%	May	11	10.68%
June	12	4.53%	June	14	13.59%
July	12	4.53%	July	15	14.56%
August	15	5.66%	August	13	12.62%
September	32	12.08%	September	15	14.56%
October	45	16.98%	October	17	16.50%
November	42	15.85%	November	6	5.83%
December	26	9.81%	December	6	5.83%
Total	265	100.00%	Total	103	100.00%

Question 2: How satisfied were you with the licensing process?

Responses	# of Responses	% of Responses
Very Satisfied	16	24.62%
Satisfied	22	33.85%
Neutral	6	9.23%
Unsatisfied	12	18.46%
Very Unsatisfied	9	13.85%
Total	65	100.00%

Question 3: Did you find the licensing process easy to understand?

Responses	# of Responses	% of Responses
Yes	43	66.15%
Neutral	7	10.77%
No	15	23.08%
Total	65	100.00%

Question 4: If you answered "No" to Q3, what was hard to understand? (Select all that apply)

Responses	# of Responses	% of Responses
Regulations/requirements are too confusing	9	20.93%
Could not easily find information on licences	4	9.30%
Process was too complex	11	25.58%
Other	13	30.23%
None of the above	6	13.95%
Total	43	100%

Other Responses	# of Responses
Too many government agencies to go through	3
Process was too long	2
Catchment areas were unclear	1
Regulations are inconsistent and confusing	1

Question 5: Have you ever used the services of a Class A or B licensed abattoir?

Responses	# of Responses	% of Responses
Yes	36	55.38%
No	29	44.62%
Total	65	100.00%

Question 6: Was there a particular reason you opted for a Class D or E licence instead of using a Class A or B abattoir? (Select all that apply)

Responses	# of Responses	% of Responses
Class A or B is too far away	54	32.73%
Class A or B is too costly to use	36	21.82%
I prefer to do it myself	34	20.61%
Class A or B does not provide the slaughter I need	24	14.55%
Class A or B only operates seasonally	12	7.27%
None of the above	5	3.03%

Question 7: If you have decided to not pursue licensing, even with an accepted Class E feasibility study, please explain why:

“Now a Class B, if an E comes available I would go to an E.”

“I was told in a letter from the ministry that because I had an abattoir close to me that my Class C would be pulled and not renewable”

“The limits of a Class E strangle economic feasibility. 10,000lbs live weight does not justify building even a small facility. Not being able to sell to restaurants/groceries is also extremely limiting. There should be no weight limit at all, it just protects the monopoly of existing Class A/B facilities, which are very unsavoury to me and my customers, both the facilities themselves and the animals' travel. It is simply inhumane to move animals very far from where they were raised, and the stress at their time of death dramatically and negatively affects the meat quality. By contrast, what health/safety benefit is there to a Class E weight limit? None at all.

Personally, forget Class E entirely, I would prefer to build a "small scale A/B" with new regulations to support facilities that are clean, safe, humane, and extremely small scale (and, therefore, affordable to build). A network of small scale abattoirs could be supported by a "mobile inspector" who we can schedule in for slaughter days. (By contrast, "mobile abattoirs" are a joke, a logistical fiasco and rarely ever move. It's much easier to move the inspector to small facilities dotted all over the rural place.

BUT current regulations force very large and expensive facilities which are so far from being economically viable as to be laughable. I need to build something extremely "lightweight" that's not intended to crank animals through, but rather to do a small number of a diverse range of species at any one time. To make it worth the inspectors' time, it's easy to arrange a full day of slaughter. If there is any weight or animal-number limit, perhaps it should be the amount required to justify getting the inspector on site for a slaughter day.

It is absolutely possible to build a cleaner, brighter, happier place for animals to die than the current dungeons of doom "class A" that are available in my region, and for FAR less expense than is required by the regulations.

Give me my right to kill animals safely, cleanly, and humanely on my farm, with no limit on how much and who I will sell to, in an efficient and very small scale facility, overseen by an inspector to make it "Class A". Class E faces a lot of negative pressure from the big abattoirs and others, sometimes for good reasons... But it is the only stopgap right now until it is finally possible for us small farmers to build the legal processing facilities we desperately need and want for our businesses. "Small Scale Class A/B with a Mobile Inspector." I want to see this happen.”

“When we got our license, there was a small group in our region that came forward and did the course and set up small scale. We had gotten our licenses months before the local slaughter house and we were already doing our business.

When our license was getting close to expiring last year I got an email or letter, can't remember which. I contacted the HO [] to see what was up and basically was informed that there was no use for us to try and renew. The regulations were not in our favor. [] has a certified abattoir and thus we would not have a chance, even though we had our license before they did.

"So in reality, what's the use?" we ended up getting squeezed out by the system.

Also sometime in the beginning of our license, the local HO contacted us and informed us that someone in head office had wanted to try and make our slaughter licenses even shorter to around 2.5 years just so that the now open abattoir could get the business.”

“We had been taking our meat to a farmers' market, so had to cease when our license was rejected. It would have cost us an extra \$600/animal compared to butchering on our premises. Others just 10 minutes from our farm received their license, so of course we had to charge our customers an obscure amount compared to them, as they butchered on their farm. We just gave up, now we are too old to start over.”

“I have my Class D - one of the very first issued”

“i did not set up a class poultry facility as the cost to set up the facility would be quite high and i am only granted a license for 2 years that can revoked after the 2 years if a class a facility opens within your parameters. pretty hard to justify thousands of dollars to be able to process potentially 3-400 birds. that works out to around \$25 to \$30 per bird in slaughter costs alone at least depending on cost of facility. are you interested in some \$10 per pound birds? probably not and neither is anyone else. pretty hard to make that commitment. [] how would it be if you were forced to use a mechanic for your vehicle that you had only negative interactions with. hey lets just say that you also have been denied the right to do any work on your own vehicle or be prosecuted. not a very manageable situation. nice freedom. “

“In response to question 6 - I prefer to use a class A/B facility - however the only one within 2 hours (and only by a few minutes) is booked solid 5-7 months a year and I cannot get animals processed (slaughter only, we use a licensed cut/wrap facility for consistent further processing). “

“[] We raise organic animals and are going into the certification process this year with this we felt the need to know our investment would be worthwhile.”

“My feasibility study was not accepted because my municipality opposed it. They said there was a bylaw preventing slaughter but I was not able to find this bylaw. We were in the ALR but didn't have the resources to "fight city hall" so we shut down the part of our operation the Class E would have addressed.”

“Transport cost is too high and time consuming from my farm and why should I have to pay someone to do something I can do myself.”

“pretty sure we were told that we could not have a lic unless we had a full fledged abattoir, a complete building and tens of thousands of dollar's for a hand full of cattle, way to in depth and complicated farmers have been doing this for ever and to be told we cant do our own customers animals is crazy. I have no problems with some education like the class e lic training was great.

but I would like to know how many cases have there been of sickness from famers doing it them selves compared to the recalls from the grocery stores. seems like there might be a control issue also

again there was no choice we were forced out

it was made pretty clear in the emails and phone calls that our licenses were not going to be renewed when they expired and we would not be able continue our slaughtering for customers “

Question 8: If your licence has expired and you chose not to apply for another licence, why did you choose not to re-apply? (Select all that apply)

Responses	# of Responses	% of Responses
None of the above	7	31.82%
Too many restrictions	5	22.73%
The administrative requirements were too time consuming	5	22.73%
No interest in selling meat	3	13.64%
Licensing was too complex	2	9.09%
The Regional Health Authority visits were too frequent	0	0.00%
Total	22	100.00%

Question 9: In your experience, does your Class D or E licence provide you with adequate opportunity to access the market for meat products in your area? Please explain:

“Yes it does, gave us opp to sell from directly from the farm to customers in our community. Also were allowed to sell through farmers markets. Customer had confidence that we had this licence”

“Absolutely did. D licence made me very happy.”

“People prefer to use our services rather than the local Class A or B abattoir. As well, local people can't afford the meat.”

“Class D has options to be able to sell to a retail market, lots of opportunity here. Opened up the market.”

“Yes good local market for anything farm raised up here.”

“Yes.”

” Yes.”

“Yes it does.”

“Yes.”

“It allows you to do farm gate sales”

“Not allowed to sell to supermarket, no access to retail outlets.”

“Class E would give me oppoutinity to acces the market.””

"It does if you're in a rural area. Helps encourage people to get animals use the abattoirs. D and E is an entry level licences and can progress to a higher level."

"Cuts out a lot of middle men. Fair market value. Consumers don't realize the costs."

"Not completely, limits who I can sell my meat to."

"Yes, it provided adequate access to the market."

"No. We could be doing a lot more. Meat shops that do my butchering want my meat, sausages. Bison. Because our Bison, all grass fed. Restaurants want my meat. Three businesses that we can't sell to. Frustration."

"Yes it works fine in our situation."

"Yes."

"Yes I could sell parts of beef or whole beef to neighbours who needed it"

"No. See comments above."

Farm-gate and Farmers Markets are a totally reasonable limit on Class E/D licenses, in my opinion, because it forces the "face-to-face" contact between customer and producer that is the trust on which that license is built.

That said, it's fine for the very small scale, but not for a commercially viable small scale operation.

I need access to restaurants, groceries, etc. to make it possible to reasonably earn enough to justify the operation. I understand the need for inspections to bring the meat up to that "Class A/B" level... and this is what Class E lacks.

What is needed is a standard set of "small scale abattoir" regulations that apply to BOTH "Class E/D" and "Small Scale Class A/B"... the main difference would be whether or not an inspector is on site. If slaughtering is required with no inspector around, that meat can be sold as Class D/E, with the limits to market. If slaughtering can be scheduled with an inspector, that meat can be sold as Class A/B"

"Yes. We have no problem selling our meat because people know about our high standards. Probably most customers do not know much less care that we have the Class E licence for our beef and pork."

"Yes."

We sell organically raised meats and humanly treated animals, if we have to ship, adrenalin levels are spiking in the animal and are present in our meat, which then is of lesser quality."

"Yes. It does."

"As to question 8, regulations shut down our operation."

9. Yes/No to the question. At the time we were able to process and sell to the locals via farm gate and at a fair price.

The "no" part was the restrictions put on us by being in an area that now had a licensed (A/B) abattoir. Had we wanted to sell to local food establishments we were not able to from our operation. Had we just been over the line [], then the restrictions would have been much different.

Farm gate sales for product are usually a bit more than the local stores, and that is the select group of people that we sell to. Problem with the region is that our population is very small and the amount of people willing to pay the extra expense is very limited, not like the lower mainland and Vancouver Island. Having access to the local restaurants would have greatly increased the potential for everyone in the local system."

"Yes, we are geographically isolated and wouldn't be able to afford it otherwise."

"Generally, yes, but the limitation of selling in our Regional District causes me problems. I do farm gate sales."

"yes

It has worked out very well for me. About half my lambs are slaughtered here and go straight to consumers. The costs are reasonable and the time saved is very significant. Also less stress on the animals."

"My class e was discontinued when I reapplied after it had expired.

There is now a Class A within 2 hours.

I have used the Class A for a year and am now doing less birds. Driving 1.5 hours each way 3 times (once to drop off, once to pick up and drop more off, and then again to pick the last ones up).

I have been using [] I have been very happy with the job they do, they are just not big enough to do all my birds in one day. Hence why it takes multiple trips.

I sell at farmers market and farm gate. My customers were very happy that my birds were never trucked to slaughter and everything was done on farm.

In 5 years and thousands of birds I never had a complaint about cleanliness or food safety.

I understand the decision made to not renew my license was based on the current rules. I believe the current rules are based on outdated ideas around how food is to move from farm to table.

I hope that in the future the government reevaluates the rules around class d and e. I would like the ability to slaughter on farm mixed with the ability to take animals and birds to an abattoir."

"Absolutely Not. We are no longer able to apply. We are now slightly within the area of a new abattoir so we are obligated to use him. He is 150% more in cost than market. He cannot fir out volume in. He

has terrible customer service and inexperience - yet I am supposed to use him. Our market is also a lot of commercial business. In our case we would not be able to sell to commercial. Since we are also close to the Alberta border, 50% of our customers are there. We are not able to move meat across the border. We have decided to close down our business until we have a resolution with the government. [] The whole system is designed for large ag business, not local food. The entire system is broken.”

“Not really. The public relations of the Big slaughterhouses still impresses the local markets that there is something substandard about a Class D operation, at least in my area.”

“No. Volume levels are too low for farm gate sales.”

“Yes, I have more rabbit meat customers than I can provide for. Being able to sell in a retail setting with my class D is more convenient for the public and myself. Also I am a customer of other farms with class D and E licenses and find it very helpful to have access to local meat.”

“no. not allowed to have a class d or e.”

“No. We sell outside our regional district on a regular basis - the restriction on regional district needs to be lifted.

Class D licenses need to be available in all areas of the province - our business model has changed and most of what we process will be going to a retail establishment (that we own under a separate corporation from the farm) - so by default we can't sell the meat to ourselves with a Class E”

“In my experience yes. I am a small producer and can easily sell out via farm gate of what I am able to produce with my e license without needing any commercial sales.”

“For a smaller scale farm wanting to grow our business we do not feel the class D and E licensing provides opportunity for growth in our market due to only being allowed a small number of animals slaughtered for market. We find we're in an odd scale between the smaller class E and D and then the larger class A and B licenses as we'd only be allowed to raise just chickens or just pigs with the allotted weights allowed. With the larger class A and B licensed facilities they don't want to take on the smaller batches of animals from farms like ours and usually have too small of a window for processing as we do batches of 200 chickens every 8 weeks for 7 months of the year and most licensed facilities in our area only process 1-2 months of that time frame for poultry. Alongside that we do roughly 10-20 hogs a year and most facilities prefer larger amounts, don't like to deal with the heritage colored pigs we have, and have long wait times with set dates almost a year in advance. All this said and done most facilities don't slaughter within the organic standards we would need.”

“No. We were not granted a license for the reasons mentioned above. I believe that the Ministry should have gone to bat for us on this issue. Municipalities should not have the power to prevent farmers from carrying on normal farming activities which should be protected by the Right to Farm Act.

We have since moved to a different regional district and would not qualify for a Class E or D because we are not in one of the designated regions and there is an abattoir within 2 hours of us. We bought this property so we could expand our business but quickly realized that the local abattoir cannot handle the volume we need to produce in order to be profitable. We have had to scale back to less than half that number and take off farm jobs. Even if we could get a class E, it wouldn't be a reasonable option. The limits are FAR too low and 90% of our customers are outside of our regional district and include restaurants & butcher shops. We would still have the problem of cut & wrap for our direct to consumer customers.”

“Generally, yes, but the limitation of selling in our Regional District causes me problems. I do farm gate sales.”

“No, being restricted to one RD stops customers from purchasing our product. Some customers that want to buy from us live just outside our RD.”

“Yes; we are 100% Farm Gate sales.

Enjoy repeat customers; selling all that we produce yearly.”

“No it does not. There is too much regulation that only serves to drive up the cost to the consumer.”

“Yes - my Class D license allows me to access retail markets in my community.”

“Yes”

“Absolutely ! We are small producers (10 cows) and farm Biodynamically so we are only interested in offering our specialty product to locals.

To keep my remarks in context, we are currently using the local class A facility that was not operating when we applied for the Class E. They have opened and closed several times since, are open at the moment ...When we applied for the Class E there was no licenced butcher shop locally either so we had to haul to an A facility. There is now a licenced butcher shop nearby that could process our carcasses.

We sell pieced meat only (1 steak per pkg) and our target market are people with a small freezer and limited cash flow.”

“I would like a bigger area for my bison products with my Class E”

“Under my E licence, I can process for family and friends. I tried, for years, to get a D licence but I was categorically denied. When I originally use(d) the abattoir [] the service was unacceptable due to the slaughtering dates I was given. After I complained about this, the service improved but it was still very expensive, both in money and time. In addition, I didn't get my hides or any organs back and they all have their own value, which I was denied.

The very shortest one-way trip to the [] is 2 1/2 hours (over a very high mountain pass), with road conditions being ideal. The trip HAS taken 10 1/2 hours when avalanche control was started after I

couldn't take a different route. That different route, under ideal road conditions, takes a minimum of 4 1/2 hours and can take much more, depending on tourist traffic.

All of this travel is unacceptable, both to me and my animals and, additionally, for the safety of the frozen meat after sitting in my vehicle for a minimum of 2 1/2 hours. “

“No. By carrying only a Class E, we are unable to sell to restaurants, cafes, etc.. If we had access to a Class D license (we are not in a designated area), we would have more access to these options to grow our business. Furthermore, because we are isolated to our regional district, this adds an additional limitation to our sales.”

“It is adequate”

“My class D License provides me with the option of selling beef through local outlets; when I have more beef for sale than has been ordered and sold by 1/2 and 1/4s”

“I sell everything I grow, mostly surplus to what we consume ourselves. I have the same 15 or so customers for turkeys every year, they know and trust and value my product. I do no advertising - all word of mouth by people who are very happy with the product and the farm methods we use.”

“Yes. Without a Class D or E licence we would not be able to operate a farm. We live []. We typically slaughter 1 to 3 sheep or 5 to 8 birds at a time. There are no Class A or B facilities in our area. In order to get to a Class A or B slaughter facility we would have to take a ferry at a cost of \$75+ each way to deliver the animals. (\$150+ roundtrip.) And likely another \$150+ to pick up the carcasses once they have been processed. That's a minimum cost of \$300 each time we slaughter. (An extra cost of \$100 to \$300 per sheep, and \$60 to \$75 per bird!)

With a Class D & E licence we can slaughter meat for sale in our community. There is enough demand for locally raised meat that we could produce 10 times what we currently do and still not meet the demand.”

“With a Class E we can only slaughter 10 beef so we can not expand our market”

“No. The limits are too low. We are lucky in that our regional district has an excellent market for local specialty meat products, despite inadequate meat processing facilities. We have been able to market all the meat we slaughter onfarm under our Class D licence easily, and have had to turn down marketing opportunities due to our inability to scale up further in some enterprises under the current regulatory environment. We feel fortunate to have had the opportunity to begin marketing our products under the Class D licence system, but request that the system be improved to increase our ability to access markets, both in terms of increased limits and in improved oversight and training to increase productivity and to ensure product quality and consumer confidence.”

“No!

The limitations of only being able to sell quarters, halves or carcasses just does not work! We have moved from a society of people who have meat cutting experience to a consumer society that finds the convenience, accessibility and pricing at regular stores or butchers that no longer has the skills to process a quarter, etc into the common cuts found in commercial stores.

Now it is true that the customer can take it to a "cut and wrap" facility but the cost to the farmer is money up front for the service, travel time to deliver and pick up the product which also have up front costs before the farmer can convert the product into cash. The service is not cheap, with costs in my area ranging from \$.90 to \$1.10 a lb. when I add in the other costs it would probably pencil out to close to \$2.00 a lb.

Now I have tried to pass this cost onto my customer but they find that dealing with the butcher or facility has a cost, is time consuming and is often not readily available as facilities and butchers demand them to conform to their schedules and not often convenient for their personal schedule.

The limitations of having uninspected meat limits the market considerably, where a restaurant might consider the product because of taste, lack of additives, pasture raised pork, they are not allowed to use the product commercially. Also their regular suppliers don't like the lost sales and competition and can restrict the delivery, insist on minimum orders and other devices to limit my ability to market to their customers on my product.

In reality, I could not supply a commercial facility as I would have to have a larger herd to provide year around product. It's a real dilemma.

A small farmer raises animals, he has neither the skill set, time or bankroll to market in the consumer market."

"No.

Limitation of regional district is ridiculous. If a farmer lives adjacent a district boundary, they can't sell to half their neighbours. In rural areas of the province, economies and trade between regional districts are strongly linked.

This is basically a trade restriction. We are Canadian farmers having our hands tied by our provincial government. If my meat is okay to sell in my regional district, it's safe to sell anywhere in our province.

I'd love to access more markets but with the limitation of 10 animal units, I don't have enough to sell those markets."

"It enables us to sell at markets, to stores and restaurants if we wish. Biggest hindrance is the difficulty and cost associated with obtaining insurance."

"all of the above question 8 would apply if we were able to reapply

yes class d and e worked for us. We would be happy with that"

Question 10: Right now, how familiar are you with the regulations about Class D and E licences?

Responses	# of Responses	% of Responses
Very Familiar	18	28.13%
Familiar	34	53.13%
Neutral	9	14.06%
Unfamiliar	3	4.69%
Very Unfamiliar	0	0.00%
Total	64	100.00%

Question 11: Under the Meat Inspection Regulation, an "animal unit" is 1,000lbs. How satisfied are you with the amount of animals you can slaughter per year, which is 10 animal units for an E licence or 25 animal units for a D licence?

Responses	# of Responses	% of Responses
Very Satisfied	12	18.46%
Satisfied	24	36.92%
Neutral	7	10.77%
Unsatisfied	10	15.38%
Very Unsatisfied	12	18.46%
Total	65	100.00%

Question 12: If you answered "Unsatisfied" or "Very Unsatisfied" to Q11 – what limits would you think are acceptable? Please explain:

“20 animal units for an E licence.”

“30 units”

“Class E licence doubled.”

“E should be the same as D. Or graduated after passing inspections. Risk based slaughter allowances. A person that has passed all the tests should be able to graduate to a higher limit. Customers will go to the place they trust.”

“We have 4 to 5 streers and about 100 lambs to slaughter a year”

“See comments above. There should be no weight limit at all. Does the meat suddenly get tainted once you're processing more than 10 beeves? No. It's just a political move to make the Class E undesirable, to protect the existing abattoirs unfair, uneconomical, unhealthy monopoly. It has nothing to do with healthy food.

Furthermore, no weight limit is actually needed, because the marketing restrictions (farm gate/market) on Class D/E (which are appropriate, in my opinion) are more than enough of a limit on how many animals can be processed AND find a market.

The lack of oversight over Class E licensed slaughter (ie. no inspector) is problematic, which is why I recommend "small scale Class A/B", a new set of regulations that make it dramatically less expensive to build a licensed facility. It is possible to do this with absolutely no sacrifice to health, safety, or humanity.

If such a Small Scale Class A/B were available, the class E/D should continue to exist as well WITH marketing limitations (farm gate/market), both as an "incubator" where new and very small scale producers can cut their teeth on the industry, and where Small Scale Class A/B processors can slaughter some small amounts without an inspector on hand and sell it under Class E regs."

"We raise Scottish highlands a smaller breed. It is not equivalent to a Red Angus steer. 1 = 1?"

"For us at the time, it would have been a lot of birds to process. But I could see that restrictions would be a problem for many that may have wanted to pre sue this type of venture."

"A small farm can't make a living on 10 animal units a year.

This limitation is slowly killing small scale livestock farming in BC."

"I think that I should be allowed to slaughter as many birds as I can safely deal with and sell under the rules set out. meaning farmers market and farm gate."

"There should not be any limits providing there is a system in place for monitoring quality control."

"I think you misunderstand how the animal units apply to Class D licences when it applies to poultry. I would love to gear up my business to deal with marketing 25,000 pounds of poultry!! This is a very poor question."

"Limits should be related to risk and not arbitrary volumes. If an operator has adequate facilities and demonstrates acceptable health management and skills, limits should not be a restriction which then directly impacts livelihood viability."

"Farmers need to be able to make a living. Under current amounts a class e allows for roughly 30 pigs a year to be processed - we process that in 3 months most of the time, even under a class D (which currently we cannot get) it only gives me about 75 pigs a year - that is not enough to be able to make a living."

"The limits I think that could provide a farm with a viable business would be 25 animals units for the E license and 50 units for the D license. For example, with the current E license at 10 animal units we can only raise 2000 chickens a year which we charge \$25/a bird, with this you'd only make \$50,000 a year before your costs, usually working out to only \$10,000 net all said and done, which isn't a livable amount for a farm to survive on, especially taking into account this would be for 2 people running the

farm. With the opportunity of being able to grow we'd be able to run a profitable business, raise both pigs and chickens all the while supporting our local economy and creating more food security in our region. “

“The limits are too low and do not allow a producer to process enough animals to earn a living or to earn enough profit to justify the expense of setting up the infrastructure required to do so safely and efficiently.”

“A small farm can't make a living on 10 animal units a year.

This limitation is slowly killing small scale livestock farming in BC.”

“We feel that Class "E" should have the 25,000lbs restriction and Class "D" should be case by case determination.”

“For our operation (and our age & energy level) the animal unit amount is sufficient. For other operations that 10 unit limit is a barrier to a viable business.

I would like to see an option for a license holder to apply for an increase to the 10 animal units.

If all food safety, animal welfare and environmental concerns can be met then increases to the 10 animal units should be permitted.”

“20 units would be more useful. We were told that at our slaughter house that it meant "weight of hanging meat" we asked the same question twice to make sure.”

“I believe that a proven E-licence holder should be able to graduate to a D-licence after a certain period of time (or product) has passed, similar to an apprenticeship in any other "Trade" in the province.

Some of the qualifications should be an appropriate (sanitary and safe) facility, a safe disposal site, demonstrable animal health knowledge and demonstrable food safety knowledge. I'd be very willing to discuss this further, if anybody cares to contact me.”

“We don't understand the point of the limits. If it can be done safely, there should not be any limits.

Secondly, why are the limits blanket and not broken into species, or something similar?

Furthermore, if we hold a license for poultry we are following limits with the BC Chicken Marketing Board and/or BC Turkey Farmers, what does slaughter limits have to do with it?”

“The limits are good, but I would think that they should be 450 Kilograms, rather than 1000 pounds. (We are in Canada, not the USA.)”

“We would like to expand our market of grass fed beef and would actually love to send it to Class B slaughterhouses, but they are all closed in our area or open one year and then closed for a few and then open again. So we would like to see that every ranch is inspected, individually. Not all Ranches can handle the same amount of animals for slaughter.”

“I do not think that the Class D limit of 25 AU is reasonable. As a multi-species farm and poultry small-lot permit holder, I reached this limit very quickly. My 2000 broilers use 14 AU, 300 turkeys 7 AU, 250 saleable cull laying hens 1 AU -- That is already 22 AU, leaving only three AU for other species (I raise cattle and pigs also at this time). I am still forced to take all my red meat species to a Class A facility that is over two hours away, despite having an adequate facility and staff to accomplish much more on farm. The poultry only accounts for nine (9) working days in my abattoir. To have invested thousands in my water system, thousands more in processing equipment, and then to be limited to less than two work weeks of processing throughout the year for no apparent reason seems ridiculous. A low limit does not improve the food safety of my products.”

“Enough to make a living. It's debatable whether the 25 animal units is enough to make a living.

If we want to encourage small farmers and support the movement towards ethically grown food, we need to allow farmers to make a living. Current limitations don't allow for this. The limitation for E License effectively turn licensed farmers into hobby farmers as they must work off farm to make ends meet.”

Question 13: Do you think the animal units should be based on species type, rather than weight? (for example: 100 chickens, 10 cows)

Responses	# of Responses	% of Responses
Yes	32	53.33%
No	28	46.67%
Total	60	100.00%

Question 14: In order to be eligible for a Class E licence, the travel time to the nearest Class A or B slaughter facility must be greater than 2 hours. How satisfied are you with this policy?

Responses	# of Responses	% of Responses
Very Satisfied	1	1.61%
Satisfied	8	12.90%
Neutral	13	20.97%
Unsatisfied	13	20.97%
Very Unsatisfied	27	43.55%
Total	62	100.00%

Question 15: What do you think is a reasonable travel time for bringing your animals to a Class A or B facility for slaughter? (Select all that apply)

Responses	# of Responses	% of Responses
Under 15 minutes away	15	19.48%
16-30 minutes away	21	27.27%
31-60 minutes away	26	33.77%
61-90 minutes away	8	10.39%
91-12 minutes away	5	6.49%
120+ minutes away	2	2.60%
Total	77	100.00%

Question 16: In your area, does winter weather make transportation of animals more challenging?

Responses	# of Responses	% of Responses
Yes	54	84.38%
No	10	15.63%
Total	64	100.00%

Question 17: With an E licence, meat sales are restricted to within the regional district in which the slaughter establishment is located. These sales can only take place at the farm gate and at farmers markets. How satisfied are you with this regulation?

Responses	# of Responses	% of Responses
Very Satisfied	9	14.29%
Satisfied	18	28.57%
Neutral	8	12.70%
Unsatisfied	15	23.81%
Very Unsatisfied	13	20.63%
Total	63	100.00%

**Question 18: If you answered "Unsatisfied" or "Very Unsatisfied" to Q17, please indicate why:
(Select all that apply)**

Responses	# of Responses	% of Responses
Class E licence should allow sales to retail outlets	18	45.00%
Class E should allow sales outside regional district	22	55.00%
None of the above	6	15.00%
Total	40	100.00%

Question 19: Would you be willing to agree with increased regulatory requirements for food safety and animal welfare, including more training, if more Class E licences were allowed?

Responses	# of Responses	% of Responses
Yes	43	70.49%
No	18	29.51%
Total	61	100.00%

Question 20: How satisfied are you with the current record keeping requirements?

Responses	# of Responses	% of Responses
Very Satisfied	7	11.29%
Satisfied	31	50.00%
Neutral	18	29.03%
Unsatisfied	5	8.06%
Very Unsatisfied/Unsatisfied	1	1.61%
Total	62	100.00%

Question 21: Class D licences are only available in designated rural areas as specified in the Meat Inspection Regulation, under the *Food Safety Act*. Should more areas be designated?

Responses	# of Responses	% of Responses
Yes	47	87.04%
No	7	12.96%
Total	54	100.00%

Question 22: If you answered “Yes” to Q21, please explain:

“I think Class D licence should be available province wide, because it is an excellent option for farmers.”

“Other people in the area had the Class E licence. But when their Class E licences expired they were not eligible for another Class E, so they've gotten out of producing because it was too hard to keep going. Couldn't sell local.”

“MAy be other areas that could benefit form this service”

“Current regulatory requirements prevents producers from selling local meat. Huge economic impact on the local market. The economics of the small scale producers using the big facilities is unreasonable.”

“Opened up to anyone who wants to do their own processing.”

“A lot easier and less stress on the animals.”

“Some areas that are so far removed. Someone needs to talk to those people.”

“Access to supermarkets would greatly help my business.”

“Hearing of areas that had a Class A or B that shut down, and those areas have no service available.”

“If an area needs it they should be allowed to have it.”

“If both people are rural as long as you have a good operation you should be able to operate.”

“Would make it more handy for us.”

“In the East Kootenay we don't have the adequate facilities for slaughter. The butchers get full and the meat can get contaminated by hanging in a cooler with game meat.”

“Here in [] the slaughterhouse opens and closes with different meat cutters on a regular basis and we can not provide our customers with a consistent product under these circumstances. At the same time we are not able to get our on farm licence because the plant may open up again. We don't care what license we get as long as we can butcher our certified organic grass fed beef and lamb without the hassle of the last years.”

“Why not open it up to everyone who has meat to butcher”

“Even 25 AU is hardly economic. But it's a heck of a lot better! Again, there is no health/safety logic behind the weight limit.

The entire "distance to a Class A/B" reasoning behind eligibility for Class E/D, and for designation of rural areas, is also based on extremely flawed logic.

Does meat processing get less safe the closer you are to a class A facility? No, the only thing going on here is protectionism.

(An aside, it doesn't even protect the big players! If small scale class A/B abattoirs were a possibility, it would result in an increase in local production, an increase in local markets, and so an overall increase in the farm economy. After a period of lower volumes during a period of adjustment, the big players would see their volume increase again to higher volumes than before as more production and demand would make the use of the bigger facilities more economical.)

As small scale producers, we face a chicken-egg problem. The use of Class A/B facilities in our areas is NOT VIABLE for many, many reasons, but we cannot increase our production without good slaughtering and butchering options. We want to increase production, but we need to be able to slaughter our animals VERY CLOSE TO HOME. That is absolutely the key, both in terms of animal stress and the bad economics of transportation for small production volumes.

Right now, for example, let's say I have 10 goats to kill. I have to drive 2 hours to drop them off, 2 hours to get home, then 2 hours to pick the carcasses up, then 2 hours home. That's 8 hours of driving, absolutely ridiculous for 1 AU. On top of that, I have to book it in, and the timing is often very inconvenient.

Let's say I was doing rabbits and had 50 rabbits (about 0.3 AU) to kill once per month (which would be a lot to kill at once for a typical small scale rabbit producer). Again, it would be 8 hours of driving for a measly 125lbs of meat. Plus they charge \$5 per rabbit!! Are you kidding me? I can slaughter/clean/hang (cleanly, humanely) 10 rabbits an hour by myself. So, if I could slaughter at home and sell it to the Italian grocer down the street, I'd save \$250 in slaughter fees and 8 hours of transportation (say, \$20/hr for a driver, plus fuel) for a grand savings of \$500!! That's \$10 per rabbit! At best, I sell them for \$20 each!! And production cost is at least \$10 per rabbit!! The current regulations do not meet my needs in the slightest.

Again: The solution is lots of small, but extremely professional abattoirs serviced by a mobile inspector. A very inexpensive facility can be built with "the basics" in a very small, very clean and cleanable footprint. BUT it cannot be built when the regulations are not entirely aligned with ACTUAL health and safety concerns, but instead with the interests of large facilities trying to sweep up the entire market for themselves. It's brutal for everyone. They're not getting my business either, I just produce fewer animals and my business suffers as a consequence too as I resort to other options to earn money."

"This is a very important issue and should be central to the future plans for abattoirs. In the Kootenays we have huge demand for organic meat and it is simply not available due to the long distances to abattoirs. There is no business case for running an abattoir here - and frankly I do not understand how government can afford to have inspectors as in the current regime.. Farmers should be able to produce greater volumes available under the Class D licences."

"Either mobile abattoirs or more on farm slaughtering"

"Anywhere more than one hour away from an abattoir"

"Que 17: I believe that there should be the same rules for everyone in the province, if you have been approved by the Gov't to slaughter and sell, then you should be able to. Just because there is now a abattoir with a higher ticket does it mean that the lower ticket operations have been lobotomized and know nothing? I do however believe that having operators selling in their zone (or near the boundaries) may make it easy to track them should there be problems. That way they are not just a number on a package without a face.

Que 19: I would have to say that the training was good. I would rather see follow ups by the local HO. I think everyone knows the rules, the question is all ways weather they wish to follow them or not. So I do not see education as a problem.

Que 21: N/A for our operation at the time."

"We need to encourage more small scale meat production and supply in our food supply. Make this more accessible. It will diverse economies and encourage sustainable and healthy food production and consumption."

"Should include all rural areas."

“We have no viable options otherwise in our area”

“The areas were covered fairly well during the initial meetings to create the Class D & E licences. It is possible that a case may be made for some additional ones, maybe.”

“Problems associated are related to A/B facilities availability more so than what is being asked in this survey.”

“Having access to locally produced and processed meat is an important aspect of a healthy diet and what customers want more and more nowadays. Knowing where your meat comes from and how the animals were raised as well as processed is a very good thing. There should be more licenses issued so more people have access to these healthier protein choices, which also supports local farmers and small producers.”

“There are farmers with class D licenses in designated areas that have more processing options within a 2 hour drive than we do not living in a designated area. [] but because they are in a designated area that doesn't even get looked at - while I had to fight for my class E (which doesn't do what I need).

“[] border is within about 80km of a class A facility - I am significantly further than that - even [] is only about 165km from a class A.”

“Isolated areas have a less cost effective way of obtaining feed, slaughter and processing. Minimum handling of the carcasses and less time taken to get the product to the consumer at a reasonable price is beneficial to all.”

“Where I [] not a designated area, but I feel it should be. There are no functioning class A facilities near enough, the one [] being the closest but it is over a wintery pass and it is not really a feasible distance in my opinion. I also feel the less animals have to be moved before slaughter, the lower stress and more humane it is.”

“We feel the areas are too broad and reach out into more remote areas forcing ranchers to drive up to 2 hours if not more each way to take their animals to slaughter, forcing them to make 2 trips for slaughter, 1 day to facility and back to drop off and then 1 day to facility and back to pick up. Forcing ranchers to take 2 days off farm away from farm work. Alongside this if their animals weren't at market weight and the preset slaughter dates needed from abattoirs ranchers are forced to bring in smaller not ready animals to make their set upon dates.”

“Class D is currently limited to 10 designated regional districts. The majority of producers are in non-designated regional districts and as such, do not qualify for a Class D license. Without a Class D license, you cannot sell to wholesale/resale buyers. These are the ideal client for someone doing on-farm slaughter, as these clients will most often take the whole animal with no further processing required. Assuming the limits for Class D could be increased, a farmer or rancher could reasonably expect to be able to earn a living doing on-farm slaughter and selling to these types of clients directly without having to deal with the further complication of cut and wrap. The easiest way to reduce the pressure on local

abattoirs and increase the viability of small-scale meat producing businesses would be to open up the Class D designation to anyone in the province and increase the limits.”

“Should include all rural areas.”

“There is no good reason why a Class "D" Licence holder should be permitted to sell uninspected meats to restaurants and meat shops in one area of BC and not in another. The logic of restricting Class "E" Lic holders from selling uninspected meats to the same outlets as Class "D" holders makes no sense. Should be all the same uninspected or inspect and sold to the same venues. It is our input that all Class D or E meat be inspected. The Gov't could train/hire a vet or similar qualified person in each region to perform inspections at Class D or E facilities.”

“not familiar with class D licensing”

“anything to cut down on travel time.”

“Its often difficult for small holdings in rural BC to have profitable operations without the sale of meat products.

As listed in an earlier question - A & B plants are often too costly, too far away or cannot provide custom slaughter needs - certified organic, certain species etc.

Allowing more Class D operations will allow animals to be slaughtered on the farm they were raised on reducing the stress of travel to A & B plants. Costs for the producers will be lower. Customers who seek out local suppliers of meat products are interested in non slaughter house options - providing there is adequate food safety standards.”

“I don't understand why people living in one area are more safe than people living in other areas.”

“I sell at Farmers market for 4 months so Class E is sufficient but for the other 8 months I am a Street Vendor bi-weekly and that is classed as Retail by Northern Health so Class E would not work for this.

I am not sure that it makes sense for Farmers Markets to be able to sell something that can't be sold all year , as long as Health requirements are met of course.

We have found that farm gate sales are negligible as we are too far from our customers.

I think more Class D licences could be issued on a case by case basis, this is such a diverse province that one size does not fit all.

These additional Classes E & D, have made it possible for small producers to make a reasonable income in isolated areas and as i believe that in going forward the demand for fresh , local product will only increase, it makes a lot of sense to enable local producers to be able to meet it.”

“We need more D and E lic. Facilities to provide a farm gate sales option. Instead of impersonal factory processing plants only. Every community should move towards ind. Food services that meet the inspection standard, but provide personal service that builds community”

“Since I believe that travel time shouldn't be more than 90 minutes, I also believe that any rural area over 90 minutes away from an abattoir should have the option of being a "designated rural area".

In addition, I think that the type of terrain that needs to be travelled should be considered. Since I have to go over two separate mountain passes (one at 1775m) the elevation and temperature variation have an effect on the animals as well as on the performance of my vehicle. You cannot consider that 120 minutes travelled on a flat, straight highway is the same as an equivalent amount of time on a twisty, mountainous road.”

“We think some of the areas currently excluded from the Class D licensing should be re-evaluated.
[]“

“Abattoirs are booked up, no room for our little orders of a few animals. It is miserable for animals to be hauled to slaughter. Expensive, dangerous and stressful. Much more humane to be slaughtered at home.”

“Customers will have more choices and producers more opportunity for marketing more competition.”

“Small farm production is valued by my customers as they are interested in ethical farming and slaughter practices. I know every animal on my farm and slaughter with respect and the least amount of stress. I know every customer personally so quality of product is top priority for me. Having to go to a mass slaughter facility simply because it is there is foolish, unhealthy and ethically wrong. Stress hormones change the quality of the meat and most of my customers know and appreciate this.”

Question 23: How satisfied are you with the on-going communication from your Regional Health Authority about the status of the program, current issues and general information?

Responses	# of Responses	% of Responses
Very Satisfied	6	9.38%
Satisfied	22	34.38%
Neutral	18	28.31%
Unsatisfied	11	17.19%
Very Unsatisfied	7	10.94%
Total	64	100.00%

Question 24: How satisfied are you with the level of regulatory oversight currently provided by your Regional Health Authority?

Responses	# of Responses	% of Responses
Very Satisfied	8	12.90%
Satisfied	27	43.55%
Neutral	15	24.19%
Unsatisfied	8	12.90%
Very Unsatisfied	4	6.45%
Total	62	100.00%

Question 25: Should there be more, the same number, or fewer on-site visits?

Responses	# of Responses	% of Responses
More Visits	11	19.30%
Same Amount of Visits	41	71.93%
Less Visits	5	8.77%
Total	57	100.00%

Question 26: How many times has an Environmental Health Officer from the Regional Health Authority inspected/visited your slaughter facility within the last 12 months?

Responses	# of Responses	% of Responses
0 times	7	33.33%
1 time	11	52.38%
2 times	2	9.52%
3 times	1	4.76%
4 or more times	0	0.00%
Total	21	100.00%

Question 27: How satisfied are you with the current labeling requirements regarding meat products originating from Class D and E facilities?

Responses	# of Responses	% of Responses
Very Satisfied	7	10.94%
Satisfied	36	58.25%
Neutral	18	28.13%
Unsatisfied	2	3.13%
Very Unsatisfied	1	1.56%
Total	64	100.00%

Question 28: How satisfied are you with the current SlaughterSafe course administered by the Regional Health Authority?

Responses	# of Responses	% of Responses
Very Satisfied	9	14.52%
Satisfied	31	50.00%
Neutral	15	24.19%
Unsatisfied	5	8.06%
Very Unsatisfied	2	3.23%
Total	62	100.00%

Question 29: In your experience, should there be more, the same amount, or less training for Class D and E licensees?

Responses	# of Responses	% of Responses
More Training	24	38.10%
Same Amount of Training	39	61.90%
Less Training	0	0.00%
Total	63	100.00%

Question 30: Finally, we would like to give you the opportunity to provide any general comments and observations about your experience relating to Class D and E licences.

“Overall experience was positive, provided ample scope for growth. Protected the customers as well as ourselves. By following requirements for Class D licence, we believed we created a better product for the marketplace. We are gratified that Province listened to the community by supporting community needs for small scale producers. The ability to hire an assistant to help with slaughter is crucial to the Class D licence, to allow people who have limited experience slaughtering animals too. If the Class D licence was not produced there would have been as many producers, but it wouldn't have been regulated and it wouldn't have been healthy for anyone.”

“Too time consuming to re-apply. Re-do a food safety plan, which is time consuming.”

“Travel stresses the animals, and stressed animals produce tough meat. Local people can't afford the meat. To take pork to abattoir they don't do the slaughter the way we like, and so it reduces work and stress on the animal by doing it ourselves. The local abattoir doesn't have holding pens. As well, local people don't want to use the abattoir.”

“Any time of travel is stressful. Contamination happens. Any transport. EHO's don't know about slaughter, as do the farmers. More education is needed.”

“Whole process has been very positive for me. Reaction from sales has been enthusiastic. Due to personal reasons, I've not been able to fully take advantage of my licence but hope to do so in the not so distant future. I am however, not sure how to renew my licence.”

“Worked very well for me. Only reason people are able to slaughter and consume local meats. People ship cattle to [], 3hrs there and ship the meat 3hrs back to get farm status.”

“The licences were a blessing. Water testing was a good feature.”

“Like to see it opened up to the entire province. Allow anyone to do the processing at home. A lot of capable people chose not to do it, due to the regulations.

Would like the Class E to be able to process for people that aren't selling, that are just using it for themselves.”

“Concern about not getting your own animal back from the abattoir/meat cutter. Doing it yourself means you know exactly what happens. Less stress on the animals. The process seems like nonsense, so much paperwork involved.”

“The stress on animals is too high when you transport them. The licensing process was too complicated, and not streamlined. Should streamline the process to make it easier for the applicant (reduce the number of steps required and number of people talked to). Suggestion: issue licence to mobile slaughtering facilities. If properly maintained mobile abattoirs could go to the farms that would be ideal. Completely remove travel stress on animals and allow the farms to sell their meat. If local veterinarians could be qualified meat inspectors. Then the vets could come to inspect the carcass and give an inspection of the meat and reduce the need transport the animals”

“Farmer has to keep reputation. And a lot of the farmers know what their doing and if they're selling bad meat, they will lose their reputation. Wanted Class E to reduce stress on animal, to improve quality of meat. Class A or B has more contamination risks than doing it at home. Insurance premiums went up. Any new people need more training than experienced farmers.

Do poultry, and the Class A or B abattoirs limited our ability. And the abattoirs opened and closed quite often. “

“The licences are a necessity if the province wants to promote local food production safely. Helps with local economy to produce their own food. Livestock on smaller acreages can prevent wildfires.

Small communities are struggling.”

“Class D and E can be a good entry level license. Should be on the business owner to increase the level of their licence, not on the government to change the regulation.”

“I now own an operated B licence facility, if E licences were re-issued in my area and my business declines I will have to shut the doors and apply for an E licence.

HA and Abattoir Association, Livestock, all pushed for me to get B licence. I have a small one, and still costs \$50k. If they're deciding to change plans and take away business they should help me recoup costs.”

"I think we should still be allowed to have them. Our area is no eligible for Class E and we would like to get them back."

"My big belief is the rancher should know best. I know when they're stressed, when they're ready for slaughter, when they're not. If you're a good rancher, the rancher knows best. If it's better to haul them. less stress, less aggravation if you do the slaughter on-farm. No worry about cross contamination.

Found sick animals at auction sites. Sheep carry diseases that Bison don't have immunity too. Species have diseases that other animals can't be immune to. Take animals from safe, clean environment to a potentially contaminated area. More control over your product. Contain the sickness, if you're animals are sick.

We'd love to be able to sell to the delis and the restaurants. They have higher training than the general public, so they should be able to discern if it's edible meat. The restaurants want to know how to handle the meat.

Bison aren't defined as livestock, so we need a game farm licence, adds a lot of paperwork and administrative requirements.

Graduated licensing to reward long-term records. Allow someone who is serious about ranching and farming, to succeed by letting them slaughter more. Like the ICBC model. After so many years with no complaints you get more production animal units or get to sell to restaurants. Provides more incentives."

"As mentioned above please let us have the opportunity to butcher our animals on farm until we have a plant that stays open and provides a consistent product. It has been a nightmare."

"I think Class D licenses should be able to sell their foods outside of the regional district."

"We lost our Class C because we lived too close to an abattoir. They are not inspected enough by government officials and I wouldn't like to charge my clients an additional \$300.00 on top of what they already pay me and the butcher. Our butcher does not run an abattoir. My cattle are not used to being hauled in a trailer so why should I haul them to be killed. That just isn't right. I care about my cattle and make sure they are killed properly and quickly so why should I not be there when they die."

"I put "more training" above, question 29, as a precursor to the main idea I propose here: we need "Small Scale Class A/B with a Mobile Inspector."

Furthermore, the role for the Class E should not be to serve small scale producers, but rather to "incubate" producers who want to get into the abattoir business and eventually get a "small scale class A/B". Class E should also be there for when a Small Scale Class A/B needs to do a small bit of slaughter with no inspector on hand.

For both reasons, more training may be required. Incubated processors can always use more training, to ensure that the Class E retains its good name: no health issues yet, right? (To my knowledge). And more

training should help push Class E holders to run Class A facilities instead. Really, there should be no difference between Class D/E and A/B except the presence of an inspector.

However, for this to work requires the regulations to be dramatically re-thought to allow for very inexpensive (but still safe, healthy, and humane) facilities to be built on a very small scale. AND it requires that inspectors be available to be scheduled in. If need be, I'd rather spend my slaughter-transportation budget on a fee for the inspector rather than on fuel to stress my animals on a long drive to a dungeon.

This "small scale" regulation should apply equally to both Class E/D and A/B facilities. The main difference between the two is the presence of the inspector.

If I had a "small scale A" license, but I had, say, 20 rabbits that I needed to process quickly and was not able to schedule an inspector, THAT is exactly the situation where the Class E should come in (along with limits on where/how you can sell the meat). I'd like to be able to go ahead and kill those rabbits, package them for Class E sale, even though the facility is licensed as an "A"... Two weeks later when a big slaughter day is planned and a "mobile inspector" is scheduled and on-site, the butchered meat can be "Class A" all the way.

Current regulations lack flexibility and, frankly, have proven to be completely uneconomic and unworkable. I believe what I propose here is a viable, healthy, safe solution to the conundrum you face. I never went ahead with Class E (not yet), because it didn't make financial sense. If you made the system as I note here, I would eagerly get a \$100,000 loan to make a "Small Scale A"!!!"

"This issue needs to be addressed within the larger context of promoting and protecting rural livelihoods. This includes "amenity-led development" as in Scandinavian countries (i.e. attracting and promoting non agricultural growth through proximity to agricultural activities - "quality of life".) Related issues include food security (affordability and supply) and local employment.

That said, there is still much unsafe practice in local meat processing. There should be more education (esp. during off-season) as well as supportive supervision. Only focusing on more "inspection" will not bring producers into the light.

Additional resources would be helpful, such as financial support (e.g. grant or forgiveable loan) for a local agency or individual to set up a humane animal transport service and for equipment cleaning facility (e.g. for poultry transport crates).

At this time, the Class E licence appears to be a nose-counting exercise. It could be the welcome mat for much more.

Class D licences are not available locally and should be.

At least some Class A and B operators deserve more support as a valuable community service for larger small-scale producers."

“Thanks for the opportunity to state an opinion.

Less regulations, more freedom is better for the economy whatever size it is. So for a farmer, let him do it, his customers will give him immediate feedback if it is good, so he will stay in business.

Have a good day,”

“It’s really important for the viability of small rural and remote farms. It needs to be kept in place and made as straightforward and easy as possible for farmers to participate and comply.”

“Que 26: We had our initial inspection to get cleared and that was about it. In our situation I see it as not being a problem as we are in the food business and operate a food truck and thus are up on most regs and I like to think have a bit more of our finger on the pulse.

But I would imagine that there are operators out there that are on the boarder line and should be checked every once in a while. It would be just like when the HO drops by [] at any time, for a surprise check. You never know when it will happen and thus you don't make short cuts [].

Que 30. So to bring this all together, we are located in a part of the province that is not greatly populated. At one time we had a sheep farm with around 80 head and got out of the sheep end of it when the slaughter rules changed. At that time we were hardly making it as it was, we were selling at \$ 3.25 lb for what you got cut and wrapped. Our slaughter at the time was around \$ 35.00 for slaughter, cut and wrap. It was a very hard sell for lamb up north, big market down south.

So now my kids are in 4H and just to have a lamb slaughtered at the abattoir's costs them \$60.00 and then \$ 0.70lb for the cut and wrap. Not that we were in that end of the spectrum, but if one does not have a buyer willing to pay the extra costs, then it is creating the demise of the system.

As for poultry, a turkey for example is \$0.70lb live wt to slaughter, so if the birds wt is 20lb and extra charge of \$14.00 plus tax is added. I was just in the grocery store yesterday and got a turkey for \$ 1.00 lb all done up and no tax. It is hard to compete and as I stated, there are only so many people around willing to pay for the farm raised, or farm to table concept.

In conclusion, I would like to see the regs changed to help the small operations succeed. I do believe that the system is traceable as to whom produced what and that the bigger problem may be the follow through from operators to follow the education that they have gotten, cutting out the short cuts.”

“All must be on a level playing ground to be fair. I think every farm should have a Class E. This would decriminalize farmers, as I think almost every farmer sells at least a few kilos of beef. We have never heard of any ill people because they ate beef from a farm butchered animal. It is not in the best interest of the beef industry to make people sick from eating beef. How many times have we had people fall ill or die from meat processed by inspected plants?”

“We are very thankful and appreciative of this opportunity. Living on [], we are very limited in options for inspected food processing. Our EHO has been very supportive and encouraging. It makes more sense to produce our food locally than ship it in and the licensing enables this to happen.”

“has worked out very well here. No problems and great product going to market.

Customers are very satisfied. ”

“Winter transport of chickens is challenging. Summer transport is even more challenging. In the Okanagan in the summer it gets very hot. This is one of the main reasons I hear consumer concern regarding bird transport.

If an animal can be processed on farm to the consumers satisfaction, that should be the greatest area of support for food safety officials.

Limiting sales of e class meat to regional districts makes no sense.

I hope this survey is putting more weight behind the needs of local small scale famers than it is the needs of large scale slaughter facilities that really don't want to deal with small scale producers.”

“The system needs a COMPLETE overhaul if local food is ever to be viable. There also needs to be an ability for small producers to get their products across provincial boundaries.”

“It appears, very obviously to me, that there is some confusion over the interaxxtions and friction with the Class A and B and Class D and E operayors that have been based (most likely) in the fear of losing someone's business. I have not been made aware of any food borne illnesses coming from any D&E operations. Have there been any over the past 8 years? If there had been there would be good reason to change things. Although I somewhat aware of the issues in the Interior and the Okanagan, I cannot see how these shoul affect the CCRD. Try, if you can, to try to see how ther area's issues would apply to the CCRD. You won't be able to! And yet, it would appear that conditions that may affect other more populated areas will influence the decisions made about the D and E licences. These decisions will, most likely, be applied to the CCRD as if they were pertinent. Perhaps gegraphy should play a much larger role in how the restrictions apply! As an afterthought, Did you know that the larger slaughterhouses that supply the [] sell their poultry at prices LESS than they sell them in []? I find it very intetresting how they can afford to do that.”

“License restrictions based on A/B facilities nearby should not be a limiting factor. Question to be asked is does the A/B facilities meet the needs of the farmer. It is this reason why so many others have sought out their own license.”

“it does not make sense that if someone is able to meet the requirements to have a class e or d would not be granted a license because someone else in the area has a class a or b. how does the fact someone else is doing something an hour away affect my ability to follow the guidelines you have set out. do we have free enterprise or are we forced to support businesses that can not operate if there is competition but only in a government created vacuum. i am not opposed to using a quality facility but find it hard to

potentially disappoint customers through policies i have no control over. this sort of bureaucracy is doing nothing but forcing farmers out of farming but that seems to be what most of the legislation around farming is trying to do.”

“Further to q. 29 - the slaughtersafe course does not cover anything really relevant to the actual slaughtering process, it was more concerned with temperatures, time to refrigeration, water quality and temps, cleaning solutions, etc. Some proof of competency related to slaughter would be a benefit for being able to ensure safety of meat being processed such as what to look for in a liver, heart, kidneys - as you are both slaughtering and doing the inspection component. ”

“This licensing was brought on by bureaucrats looking for ways to keep track of local farmer processors. In my vast experience as a farmer processor there had never been a problem with the quality, cleanliness, or handling of any meat products in my area EVER. This whole thing was brought on by government. It

does not make me happy to see people that are for the most part struggling to

provide great products to consumers regulated and charged with more expense. This licensing is also a way big box stores are gaining control of all markets.”

“I personally feel that more farms should be given class e licenses given they are able to meet the requirements outlined by interior health. The less distance animals have to travel (I am especially thinking about my broiler chickens as they are heavy, go into cages and get hot easily), the more humane the experience. I love that the birds I slaughter only know anything is unusual about their day for maybe a few seconds before death. I feel that raising animals on small farms is key to structuring humane meat practices where farmers know each animal and are able to provide a more enriching environment. As well, this helps in reducing the carbon footprint of by supplying more local meat sources (less transportation of goods), and is beneficial to the local economy of small communities.”

““We found it really hard to find the information on class E and D licensing and had to go in depth of searches to find out what we needed. We also found there was too many organizations involved and would've been better if there was just one organization who worked with all the organizations to streamline the process. We've noticed in our region with loosing a lot of our class A and B abattoirs and the small amounts allowed with high cost of needed infrastructure for class E and D licenses we're losing a lot of local farms/ranchers. All said and done the biggest hurdle we've found is there's no one representing the small-scale family farms in this whole process, most facilities will not take small batches of poultry (10-200 birds) or pigs (10-20 hogs), etc., and when facilities do they usually have a higher price point, long wait times and very small windows of time they allow said animals in if at all. We'd like to see small scale farms treated equally as any other business and if that means changing the regulations I think we need to look at this.”

“I believe animals should be slaughtered on the home farms where they were raised as much as possible. Unnecessary stress is inflicted to animals which are transported to slaughter facilities, not just

through the travel but as well as being subjected to an unfamiliar environment at a slaughter facility, new and unfamiliar smells and sounds are very stressful to animals!

as well, the stress to animals affects meat quality.

In my experience with the class E feasibility study no regard by officials was given in respect to animals being unnecessarily transported to slaughter facilities and the stressful negative effect it can have on the animals as well as meat quality.

More mobile slaughter truck/operators would be a big benefit to the industry."

"[] I haven't answered question 13 because it seems redundant. Licenses already state which species you are approved to slaughter so this question seems like asking if you would like a dozen eggs or 12 eggs. Makes no difference."

"No stress to animal with on-farm slaughter. Better Quality Product, Cleaner procedures. (Q15) This question is not appropriate as it does not give producers a required box for "No travel time". It is misleading and surely will give the Gov't the wrong idea because of it. We, as taxpayers, residents and business owners have just as much right to operate a business just as Class A and B operations. We feel that BCAA is trying to end all scale of small meat producers. There should not be any regional restrictions for Class D or E. There should not be any time restriction for travel for Class E lic holders. Inspectors should be taught and hired from regional districts so all Class of meat can be inspected. There should be online training available. There should be funding for Class D and E just like there is for abattoirs Class A and Bs"

"- mention made of liability insurance requirement for licensed Class D and E processing."

"Farm gate sales of live animals is permitted and the animal can be slaughtered on the farm by the owner of the animal. This only serves to deter any one from this practice because of the cost of having to purchase a whole carcass instead of a quarter or half. It only serves to drive a business to the (black market) which is not good for anyone. Too many regs just drive up the costs of operation and compliance. This whole problem stems from the BSE outbreak and went into overkill and is still there."

"I was part of the early process in developing the Class D & E licenses.

In our community there are still meat producers that are not licensed and this is concerning.

I think there needs to be more communication between producers & the ministry responsible for license holders.

I don't want inspectors making my life difficult but I believe having a Class D license is a responsibility and there should at least annual check-ins.

Inspections from my organic certifier are opportunities for learning & improvement in the operation.

There is an opportunity here to keep to producers connected & informed - perhaps a 1/4ly newsletter or a web hub.”

“I would like to see Class D and E available to anybody that desires and can meet the requirements (current ones are fine).

Consumers are demanding products not associated with "big industry" for many reasons including animal welfare and product quality.

For the livestock well being more class D would reduce stress as they wouldn't have to travel so far. I have had bad experiences transporting long distances to get to a class B facility, why we got our license. Putting the livestock in the back of a pick up, driving 3 hours to the facility, should be just under 2 hours but road conditions and construction often provide huge delays in my area, to sit and wait for 3 hours because you lost your spot due to being late from said delays all in +35C or -25C temps. Not a situation i would like to put any living thing into,

While cost isn't a factor in safety it is a huge reason many people don't raise meat. They don't want to slaughter themselves and getting to an abattoir 2hrs away is very expensive for a small amount of livestock. Also prices the small farmer out of the market.

To allow for more licensing I am not opposed to have more training. I don't understand why people can't be trained for meat safety. No class D or E license holder wants to make anybody sick and we stick our name on the products. In local markets this name carries a lot of weight.”

“Our number one concern around slaughtering is lack of stress for the animal.

We love being able to end their lives in a calm, natural setting.

We also want to be sure that the product we are providing is going to be safe for our customers so are happy with regulations that ensure that.

Because we do not sell meat by the side or quarter and it needs processing we have not used our Class E much, but we think the program is a great one and hope it continues.

In the past locals knew their community and knew who it was safe to buy meat from, that is not the case anymore! and there is an assumption that anything sold at a Farmers Market must be safe !

Thank you for your efforts to change and improve out local food systems and for the opportunity to comment.”

“Thank you”

“I think more producers should have the ability to manage their herds on their own (from birth to harvest) AND I think there should be on-site inspections carried out by qualified personnel who are familiar with the industry.”

“Question 4: Not applicable to our circumstances.

Further to question 6: We don't believe animals should have to be moved off farm to be slaughtered; the transport is not in the best interest of the animal and cuts into profits for the farmer. The only reason we continue to use a Class A facility is because setting up for a red meat Class D/E is currently too cost prohibitive for us. Please consider reinstating mobile slaughter facilities.

Question 8: Not applicable to our circumstances.

Question 15: We should not be forced to travel to an abattoir if that does not align with our production, or business, model. Please consider reinstating mobile slaughter facilities.

Question 26: Please note that we only slaughtered 1 time in the past 12 months under our license.”

“Re: class d and e licenses

The D license is a good thing for local farmers as it provides a local outlet in stores when a person has an excess of beef not sold in 1/4 or 1/2s to buyers

Re: training and slaughtering

over the past 30 years I have slaughtered approx. 200 animals. This has been a learning curve and became more efficient as time went on. In my opinion it would have been very helpful when I first started slaughtering to have the opportunity to watch the techniques of an experienced person demonstrate: how to prevent contamination and also how to be more efficient in the process.”

“We are a small producer that sells mostly surplus product from foods for our own consumption. I have many repeat customers, many of which come to see how the animals are living before they purchase. I provide a high quality, organic and ethically raised product, free from the stress of mass slaughter and transportation. This is the only thing that can work in our remote, ferry access location. I was one of the first 12 farmers to get my class D and part of the initial process in creating this program. I believe this to be the future of local food production as more and more people are looking for just these attributes in their diets. I think this should be an option for all farmers everywhere. It is a cleaner, healthier more humane way to process and we the workers have a huge stake in doing the job well as we know our customers and they know us. Open up this program, it works.”

“Without a Class D or E licence most of the farms in our town would not be able to legally continue. It is just not financially viable to try and move a small number of animals by ferry to a Class A or B facility. With the licencing process currently in place the Health Department can evaluate the safety and knowledge of the farms and determine if there are any health risks in the procedures that the farmers follow.”

“The regional health authorities ([], in my case) do not appear to have the capacity to oversee abattoirs. I have seen EHOs at my farm exactly once, which was for our SlaughterSafe course before we applied. Subsequently I applied and was licenced, and several times I have submitted a new Food Safety Plan for a different species or equipment revision. I have never had another inspection, a request for further water testing, an opportunity for further training of myself or employees, or any communication

whatsoever from Interior Health regarding my Class D licence. There is so much opportunity for improvement in this system! I cannot believe the government will licence us without witnessing a test kill. That would be a great opportunity for learning. D/E operators are complying with the rules laid before us -- we are not the ones making the system weak and drawing fire from the BC Association of Abattoirs. We would personally prefer to be licensed under the Ministry of Ag, and would welcome more robust requirements and training opportunities. This is our business, our livelihood, and I want to be in a position to grow my business on solid footing, confident I will have this licence going forward and that I am producing safe food for my customers. I am investigating the potential for becoming an inspected facility, but very discouraged that having, for example, a Class A red meat facility would disqualify me from completing any uninspected slaughter (of poultry, for instance, or for neighbours). Also, this could put me in a position of putting any Class D operators within two hours out of business -- no thanks! For me, the flexibility of being licensed under MoA, and of being able to access an inspector or not as required by my needs, seems to be a good way to improve the system while saving lots of money for the government. I am not sure how much it would cost to send an inspector to my farm a couple of times per month for each slaughter day, but I think it would be a lot more than it's worth to watch someone kill a couple beef or ten pigs or 400 chickens. Let's figure out a rational system that respects the realities of our province and enhances the food safety aspect of this work. Consumers demand it, businesses need it, the government should support and facilitate it. Please strengthen and expand our Rural Slaughter Facilities."

"Here is the multible problems as I have experienced them:

The problems are not in the slaughter or quantity limits, The problems flow from what happens after you have a dead carcass on your hands that you are trying to sell.

1. The price of pork that a commercial facility will pay for your carcass is listed on the Internet at \$160 (VARIES SLIGHTLY) per cwt. This pencils out to about \$.70 per lb. There is not a small farmer alive that can put a lb of pork, or really 2 lbs of pork as roughly half the pig is skin, bones, waste, intestines, hooves, etc. So I have to put 2 lbs of weight to get 1 lb of saleable meat. IMPOSSIBLE!

2. In essence, a small farmer raises a different product than a "factory farm" with better taste, meat with more Vitamin D, better psychological health. You can call both types a pig, but they are very different. And yet their is no seperate pricing formula.

A factory farm raises an animal by spread sheet and business practices. Keep the costs down, the volume up, restrict animal space, rotten breeding styles and make a little on each animal because they are dealing in large volumes. That product is a different product than what I raise.

that improves my pastures with natural fertilizer

My boars and sows breed naturally. The piglets stay with their mothers, The mothers are kept in small herds on pasture as pigs are herd animals. They can sleep out doors is they choose, walk around in an acreage. have a choice of what they eat and when they eat. In the winter they are kept in an open air

paddock, I have no odour problems, no disease problems, they have sheds and hay and I never have to worry about manure as it is spread by them over the pastures and paddocks.”

“The HAs have no place in the E licence program. Eliminate their involvement. They don't understand the rules and most of them have zero farm or livestock knowledge. Travel time is a poor way to regulate use of abattoirs. This is a ridiculous suggestion given the range of sizes in livestock at slaughter. The current system was a band-aid solution implemented when farmers revolted after our rules as they exist today were implemented.

With the current movement to local, ethical and healthy food, E License holders are left in the dust as they are severely restricted by current regulations. People clamor for our meat but we can't sell it to them because we can't grow enough or they live across some arbitrary line.

Keeping regulations as they are now will accomplish one thing; a growing black market in meat sales. This black market is large and those who buy from it have no respect for or confidence in our government to represent their wishes and needs. They want this food and the government can't effectively stop them as the process turns into whack-a-mole. New black market producers will appear to fill the gap created should the province undertake a huge enforcement effort. I don't think [] or many in the ministry understand this. They approach everything with a large hammer when what is needed is the polish provided by 400 grit sandpaper. These ministry staff would be well advised to use a carrot instead of a large stick. It's the only way they'll address the black market effectively.

Regulations as they are now discourage and punish farmers. If that was the intent of these regulations, they're working perfectly.

When I mentioned black market farmers to [] This anal and short sighted approach will accomplish nothing except drive black market farmers further underground.

Show British Columbians, whether farmers or eaters, that you care about what they want and respect their wishes. No bureaucrat should have the ability to kneecap farmers. What they think or want is irrelevant. They are servants of the people of BC and need to start behaving as such.”

“The most frustrating aspect is the challenge in obtaining affordable insurance if you are slaughtering on a small scale. The cost of insurance can outweigh any profits you may make.”

“pretty sure we were told that we could not have a lic unless we had a full fledged abattoir, a complete building and tens of thousands of dollars for a hand full of cattle, way too in depth and complicated farmers have been doing this for ever and to be told we can't do our own customers animals is crazy. I have no problems with some education like the class e lic training was great.

but I would like to know how many cases have there been of sickness from farmers doing it themselves compared to the recalls from the grocery stores. seems like there might be a control issue also

again there was no choice we were forced out

it was made pretty clear in the emails and phone calls that our licenses were not going to be renewed when they expired and we would not be able continue our slaughtering for customers

I did not like any rules when any of this started and still don't but the class e worked and education with it was workable”

Responses from Regional Health Authorities

Question 1: Under the Meat Inspection Regulation, an “animal unit” is 1,000lbs. How satisfied are you with the amount of animals Class D and E licensees can slaughter per year, which is 10 animal units for an E licence or 25 animal units for a D licence?

Responses	# of Responses	% of Responses
Very Satisfied	1	20.00%
Satisfied	3	60.00%
Neutral	1	20.00%
Unsatisfied	0	0.00%
Very Unsatisfied	0	0.00%
Total	5	100.00%

Question 2: If you answered "Unsatisfied" or "Very Unsatisfied" to Q1 – what limits would you think are acceptable and why?

“For Class Es:

10 animal units makes sense for red meat as it allows applicants to raise, slaughter and sell a small amount of meat to consumers.

10 animal units does not make sense for poultry. This number allows for an extremely large amount of birds to be slaughtered and sometimes I have concerns with the applicant's set up being feasible for such a large number of birds.

I also think using an actual number of animals makes more sense as weights of animals can vary.

I would also like to know WHY 10 animal units was chosen, why is 10 safe but not 11?

The amount allowed for slaughter at a D or E is a policy decision by gov't. If amounts are to change, resources will be needed to accommodate any increase in expected service delivery levels.”

“The limit is honor system based and very hard to monitor, so it doesn't really matter what the limit is.”

Question 3: Within the last 12 months, has each Class D and E facility within your Regional Health Authority been inspected on-site at least once by an Environmental Health Officer?

Responses	# of Responses	% of Responses
Yes	0	0.00%
No	5	100.00%
Total	5	100.00%

Question 4: If "No", how often is each Class D and E facility inspected?

Responses	# of Responses	% of Responses
Every Two Years	0	0.00%
Not every facility is inspected on a regular time period (i.e. done on an as-needed basis)	0	0.00%
Other	5	100.00%
Total	5	100.00%

Other Responses:

“Our inspection frequency is based off a risk assessment and inspections would be done on an as needed basis (i.e. complaints). Is there a requirement to do inspections every year?

scheduling is based on risk: High risk = once per year, Moderate=every 2 yrs, Low= every 5 years

Inspected at the time of issue during the site assessment; low risk every 5 years, moderate risk every 2 years and high risk every 1 year

Inspection frequency is based on internal risk assessment and policy.”

“Other - Only the initial inspection for approval of Licence is done.”

“Other - Facilities are inspected on a complaint basis and every 5 years prior to renewing license”

“Other - Every 5 years, unless a complaint or a request is made”

“Other – [] has no Class D or E licenses”

Question 5: How many of these inspections resulted in in regulatory corrective actions?

Responses	# of Responses	% of Responses
1 - 5	3	100.00%
6-10	0	0.00%
11-15	0	0.00%
15-20	0	0.00%
Over 20	0	0.00%
Total	3	100.00%

Question 6: In your experience, do you find the frequency of on-site inspections in your Regional Health Authority sufficient?

Responses	# of Responses	% of Responses
Yes	2	50.00%
No	2	50.00%
Total	4	100.00%

Question 7: In your experience, should there be more, the same number, or fewer on-site inspections?

Responses	# of Responses	% of Responses
More	2	40.00%
Same	2	40.00%
Less	1	20.00%
Total	5	100.00%

Question 8: Do you believe the current SlaughterSafe course - as administered by the Regional Health Authority - is providing the Class D and E licensees with sufficient food safety knowledge to operate an establishment?

Responses	# of Responses	% of Responses
Yes	4	80.00%
No	1	20.00%
Total	5	100.00%

Question 9: Do you think the BC Meat Inspection Code of Practice for Class D and E facilities should be mandatory?

Responses	# of Responses	% of Responses
Yes	5	100.00%
No	0	0.00%
Total	5	100.00%

Question 10: In your experience, are licensees of Class D and E facilities utilizing all the existing resources provided to them by the Environmental Health Officer?

Responses	# of Responses	% of Responses
Yes	2	40.00%
No	3	60.00%
Total	5	100.00%

Question 11: How is the current Class D and E Code of Practice being used in your Regional Health Authority? Please explain:

“It is provided as a resource document during the SlaughterSafe course. It is encouraged to be followed but it is not enforced as it is not in the Regulation. There are aspects of the Code of Practice that are above and beyond what would allow for safe slaughter making it not a practical resource for all applicants as they generally do not have large amounts of money to invest in a Class E (especially with red meat). If they are going to invest, in our region they generally opt to build a Class A or B or do not go through with a Class E.

Based on correspondence from the Ministry of Agriculture in June 2015, "At this point, the "official" recommendation is that the Code be used as a best practice guidance document for new licensees. Not mandatory at this point however."

Used during inspections and site assessments

Provided as a guidance for operators starting up Class E facilities.”

“Code of practice is given to all applicants. It is explained during Slaughter Safe training.”

“It is being brought to the attention of the applicants as part of the approval process.”

“The answer to question 10 should have been "unsure" because of the limited interaction after the license is issued. There is also limited use of the Code of Practice within VCH. Many of our class D & E facilities are small scale and do not have very extensive set ups. They have not embraced spending any additional monies to construct facilities as recommended in the Code of Practice.”

“Not applicable as we have no Class D or E facilities in [].”

Although we have no operating Class D or E facilities, we had two prospective applicants that utilized the Slaughter Safe resources during the application process.”

Question 12: At current resource levels, how many more D and/or E facilities could be adequately administered/inspected within your geographical region/district?

Responses	# of Responses	% of Responses
0	3	60.00%
1-2	0	0.00%
3-5	0	0.00%
5-10	2	40.00%
>10	0	0.00%
Total	5	100.00%

Question 13: Within the last 12 Months, how many public complaints have you received regarding Class D and E slaughter facilities?

Responses	# of Responses	% of Responses
0	3	60.00%
1-5	2	40.00%
6-10	0	0.00%
11-15	0	0.00%
15-20	0	0.00%
Over 20	0	0.00%
Total	5	100.00%

Question 14: What was the nature of the complaints? (Select all that apply)

Response	# of Responses	% of Responses
Food Safety issues	2	28.57%
Animal Welfare issues	2	28.57%
Labelling issues	1	14.29%
Quality of Service Received	1	14.29%
Other issues:		
Selling outside the regional district	1	14.29%
Total	7	100.00%

Question 15: Does the Regional Health Authority receive queries from the general public about which farms are licensed as either Class D or Class E?

Responses	# of Responses	% of Responses
Yes	5	100.00%
No	0	0.00%
Total	5	100.00%

Question 16: If yes, how often? (Select the best fit)

Responses	# of Responses	% of Responses
More than 3 per week	0	0.00%
1-3 per week	0	0.00%
1 per week	0	0.00%
More than 3 per month	0	0.00%
1-3 per month	0	0.00%
1 per month	1	20.00%
More than 3 per year	0	0.00%
1-3 per year	3	60.00%
1 per year	1	20.00%
Total	5	100.00%

Question 17: Is licensee information available to the general public in regards to Class D or Class E licensees?

Responses	# of Responses	% of Responses
Yes	3	60.00%
No	2	40.00%
Total	5	100.00%

Question 18: If yes, where?

“FOI Requests

FOIs

No”

“At the Health Unit and Online.”

“It would be if public specifically asked for it.”

“Local Farmer's Institute

Advertisements for example for upcoming Slaughtersafe courses

Directly from the VCH EHO”

Question 19: Are Class D and Class E inspection reports available to the general public (such as the Regional Health Authority’s restaurant safety rating service)?

Responses	# of Responses	% of Responses
Yes	0	0.00%
No	5	100.00%
Total	5	100.00%

Question 20: If yes, where?

“Available under FOI”

“No, only because we don't have any Class D or E licenses. If we did, inspection reports would be publicly available via our website, utilizing a similar format for reporting restaurant and food store inspections.”

Question 21: How many Class D licensing requests did you receive in the past year?

“None N/A

2”

“Zero, We are in a nondesignated area.”

“Class D - 0

Class E – 1”

“2017- - ten”

“0”

Question 22: Of these requests, how many Class D applicants completed the application and training process?

“2”

“Class D - 0

Class E – 1”

“All ten, typically people take the Slaughtersafe course and then apply for a license following it.”

“N/A”

Question 23: What approach does the Regional Health Authority use to ensure that Class D or Class E licensees are not exceeding the slaughter allowances provided by this type of licence?

“A review of records is performed during the routine monitoring inspection.

Verification at the cut and wrap used can also be used when it is suspected.

follow-up based on complaint.

Complaint basis

Check previous records of animals slaughtered.”

“the Health Unit does little to ensure allowances are not being exceeded. We take the applicants word. that they follow their food safety plan with animal units they kill. Unless we receive a complaint there is no follow up.”

“This is not something we would regularly review. Our response would be complaint driven. We would review records during the license renewal.”

“Education and advice to promote good record keeping, however, follow-up usually limited due to accessibility.”

“N/A as we don't have any in operation. However, if we did, we would require slaughter logs to be kept by the operators. Review of their documentation would be a component of the routine inspection.”

Question 24: Are you satisfied with the on-going communication from the Province about the status of the program, current issues and general information?

“No. This survey is an example of this. Multiple Class E license holders informed me of this survey which I knew nothing about. I reached out to my supervisor and beyond and this survey was not known about.

It is concerning that there is not a good line of communication between Ministry of Agriculture and the health authorities. As one of the "boots of the ground" EHOs who aims to work hard and help the local operators through the red tape I would like to see more communications. "Meat" is a niche role within our health authority and I am seen as the "farm health inspector" in the area so I am often looked to for answers (health authority, MAGRI, CFIA). Please note I am not trying to "bash," I simply would like to have more communication and knowledge to help the local farmers. I have had some great discussions with MAGRI in the past as well.

I have been out of meat inspection for some time, however Class A and B are required to go through more stringent requirements. Areas that have limited use of Class A, such as the Class A do not have capacity or they are only doing their own animals poses a problem where exception to the rule of, if there is a Class A or B around that Class E or D's can not issued, this exception has been made mostly in the Caribou and poses a problem where the market could get flooded with Class E's. There should be more support and resources for Class A's with capacity to serve the public.

Haven't really received too much official information regarding the status of the program.”

“Yes. Good communication.”

“Yes”

“The Sharepoint site is relatively poor and difficult to utilize.

Information is sporadic.

The Slaughtersafe book from 2012 could use some updating”

“We don't receive communications, likely because we don't have any active licenses in [].”

Question 25: Do you feel there is sufficient support from the Province to administer the Class D and E licences?

Responses	# of Responses	% of Responses
Yes	2	40.00%
No	3	60.00%
Total	5	100.00%

Question 26: Do you have suggestions for improving the Province's communication with you?

"I would like to know when a Class E feasibility study is received by MAGRI and from what area so I can plan SlaughterSafe courses better.

I think it would be great if MAGRI could provide a training seminar on some of the details of what the meat hygiene inspectors look for at inspection.

I would like to know things like this survey in advance so I can be prepared for the farmers calls/concerns.

I would like to know where Class D and E licenses are going, MAGRI or the health authorities?

I would like to know where the MAGRI sees the Code of Practice fitting into the role of Class D and Es.

There should be more resources to the health authorities for inspection and compliance.

Quarterly updates via email communication would be great."

"The Health Authorities pretty much administer the Class D & E licenses on their own and would appreciate better Provincial coordination of the program"

"A Provincial Sharepoint site that provides a list of all Class D and E licenses in each Health Authority would be of interest. the site could also contain the resources such as the current Code of Practice, Slaughter Safe, newsletters and other relevant information."

Question 27: Are there topics about which you would prefer more communication?

"Upcoming Class E application that will require follow up and SlaughterSafe training."

"Summary of issues from around the province"

"Annual updates on the number of provincial licenses

Significant practice issues in other jurisdictions we can learn from

information from MAGRI on any licenses that were rejected in our Health Authority and the reason they were rejected."

Question 28: Finally, we would like to give you the opportunity to provide any general comments and observations about your experience relating to Class D and E licences.

"I think that Class D and E licenses are needed. They fill a niche that the Class A and B facilities cannot. There are lots of individuals who want to know who raised an animal and know that it was done with care, they want to see the animal slaughtered on farm without having to be transported and stressed. Many Class A and B facilities have minimums on so that micro producers cannot utilize them. Without

Class Es then these producers would have no "legal" way to slaughter animals to sell meat to friends and neighbours. This would put more strain on EHOs as there would potentially be an increase in the sale of uninspected meat. Dropping the distance requirement (2 hours) would also help farmers who want to raise a few animals and sell to locals. As well, this would benefit EHOs time by not having to do enforcement but rather working with farmers by teaching more people SlaughterSafe, creating FSPs SPs and doing more farm visits to have safer, cleaner, healthier practices. Maybe this educational approach would be a better?

*Workload and work priority - at the time the D/E licencing was introduced, the HAs were required to reassign existing resources to accommodate administration and inspection related to this program. No funding for additional staff was provided. This required shifting of resources away from higher risk program areas and negatively impacted service delivery. Because of this, and the relatively low public health risk of on-farm slaughter, inspection frequencies were set low for Class D/E.

Any expansion of the program must be accompanied by funding to support desired service delivery levels.

*On-farm slaughter is the only production program that requires HA involvement and it seems out of step. There no legislated HA role in production of dairy, production of produce or other farm crops, production of fish, or production of meats on a larger scale (Class A, B). Why small scale meat production?

*Demand for SlaughterSafe is inconsistent and often desired on short notice. This is difficult to arrange and can be quite disruptive to existing program operations. The design calling for remote delivery in a face-to-face setting compounds the problem.

*Worker safety issues have been raised regarding the on-farm service delivery, resulting in extra steps needing to be taken (and extra costs incurred) to complete steps in licencing process."

"I would like to see more inspections done on the farm. To actually witness a slaughter and to insure that the applicant is following their FSP. Regular checks to be done yearly. I would like more information for the applicant regarding things to look for while slaughtering to ensure a safe product is sold to consumer.

I believe that the approval process can be done totally by the Health authority. they have the means to approve the Feasibility Studies and it would make it easier for the applicant. One shop stop idea. One agency one person."

"Colleagues in MAGRI and other associated bodies have been very responsive and helpful - they are a very good resource"

"Surprisingly few issues related to the operation of class D & E operations. The care of the animals and the handling of meat has generally been very good. The relationship with the local farmers producing meat has been positive."

Responses from Industry Associations

Question 1: How familiar are you with the Class D and E licences?

Industry Associations			SSMPA Members		
Responses	# of Responses	% of Responses	Responses	# of Responses	% of Responses
Very Familiar	4	80.00%	Very Familiar	4	36.36%
Familiar	1	20.00%	Familiar	6	54.55%
Neutral	0	0.00%	Neutral	0	0.00%
Unfamiliar	0	0.00%	Unfamiliar	0	0.00%
Very Unfamiliar	0	0.00%	Very Unfamiliar	1	9.09%
Total	5	100.00%	Total	11	100.00%

Question 2: Do you have any concerns about Class D and E licences currently?

Industry Associations			SSMPA Members		
Responses	# of Responses	% of Responses	Responses	# of Responses	% of Responses
Yes	5	100.00%	Yes	10	90.91%
No	0	0.00%	No	1	9.09%
Total	5	100.00%	Total	11	100.00%

Question 3: If you answered "Yes" to Q2, please explain:

Industry Associations:

“There are still producers who are unable to get their livestock processed due to long wait times or lack of slaughter capacity, or lack of a local abattoir. Many producers are not eligible for the licence, according to the various regional Health Authorities, even though they do fit the criteria.

This impacts our competitiveness as a livestock sector, and has resulted in some producers leaving the industry.”

“While many Class D and E license holders follow all the requirements as laid out by the CFIA and other governing bodies, without 3rd party on-site oversight there is no reassurance that they are. If we could count on all livestock owners and abattoirs to do everything correctly, there would be no need for the SPCA or the CFIA.

Small livestock producers and Class D and E abattoirs:

- Are not trained as meat inspectors and do not have enough experience to do so adequately or properly
- Have a conflict of interest when it comes to:
 - o processing an animal that may be condemned under meat inspection regulations

- o trimming contamination versus washing it off
- o removing un-fit for human consumption meat or offal
- Have little experience in handling for humane stunning which is much different than handling for pasture rotation or inoculation
- The operators do not have enough slaughter experience do so in a food safe manner
- Have no oversight to ensure they are doing reporting, collecting, remitting, animal ownership verification or waste disposal correctly
- Have no oversight to ensure procedures result in meat that is safe for human consumption
- Have no oversight to ensure they are:
 - o keeping within their processing limit
 - o processing only the animals they are allowed to
 - o following their code of practice
 - o following proper chilling and cold-chain procedures
 - o keeping within their sales area
 - o only doing direct to consumer ‘farm-gate’ sales
- Have no oversight to ensure they are following humane handling, stunning and bleeding procedures

Some of the main concerns relate to:

- Ensuring only meat fit for human consumption is produced in this province
- Animal welfare and humane handling procedures are followed
- All regulations, reporting and remittances are being done correctly
- Why don't the on-farm slaughter proponents want meat inspection?

As experience has shown, reading food safety and sanitation standard operating procedures does not reflect what actually happens when processing animals for meat. Further, inspecting a facility while not operating gives no indication as to whether proper animal handling, stunning, bleeding, contamination removal and sanitation occurs on an on-going as-needed basis.”

“[] is concerned with the consistency of regulations that Class D and E licensees follow, in comparison to other Class licence holders. The inconsistency creates confusion and sometimes animosity between license holders that may have different classes of licences.”

“Producers outside of designated regions do not have the option of applying for these licenses (or in the case of Class 'E' licenses, a high likelihood of approval)

Class D/E licenses are overseen by Regional Health Authorities (Ministry of Health), and Class A/B licenses are overseen by Ministry of Agriculture. This leads to misinformation and lack of clarity about each others standards of practice, as well as differences in available support and industry practices. Meat Inspection Program officers within the Ministry of Agriculture may have limited knowledge about and/or oversight over Class D/E licenses and their licensing processes/requirements.

Class D and E license holders are not members of BC Abattoir Association, the Province's largest related lobby group and industry association, and there is a lack of knowledge about and support for Class D/E licenses within the organization.”

“The current system is not robust enough to contribute significantly to the sustainability and growth of the small-scale meat industry in British Columbia.

Capacity at Class A & B facilities is an issue, with most of our members being unable to book animals in to be slaughtered and butchered reliably. But the Class D & E system is not a reasonable alternative.”

SSMPA Members:

“Too hard to get. they appear to be set up for the Beef farmer and not small scale pork producers.”

“I am concerned that class E/D licenses are currently too restrictive in the following ways:

*Difficulty of acquiring license

*Too many restrictions that negatively impact the livelihoods of farmers

*Alloted capacity is too low”

“They should be offered some sort of inspection on their slaughter days.

I should be able to open my own small abattoir on my farm and sell wherever I please in BC and not have to spend \$250,000 building a facility to do this.

Inspectors don't need their own office for small facilities, but they should be made available to Class D and E licensees so they can sell their meat wherever they please.

It's also unfair that I'm not allowed one of these licenses because I live twenty minutes from a abattoir that technically could do my slaughter and cut and wrap, and continue to do so, but do such a horrible job that I'm embarrassed to sell my product.”

“The limits are too low and do not allow a producer to process enough animals to earn a living or to earn enough profit to justify the expense of setting up the infrastructure required to do so safely and efficiently. The limits for Class E should be

increased to the current Class D limit and Class D limits should be assigned on a case-by-case basis based on capacity/ability.

The regional restrictions are impractical. I believe that anyone in BC who wants to apply for a Class D or E licence, should be able to, regardless of their geographic location or their proximity to a Class A or B facility. They should also be able to

sell their product anywhere in the province.

Without a Class D license, you cannot sell to wholesale/resale buyers. These are the ideal client for someone doing on-farm slaughter, as these clients will most often take the whole animal with no further processing required. Assuming the limits

for Class D could be increased, a farmer or rancher could reasonably expect to be able to earn a living doing on-farm slaughter and selling to these types of clients directly without having to deal with the further complication of cut and wrap. The

easiest way to reduce the pressure on local abattoirs and increase the viability of small-scale meat producing businesses would be to open up the Class D designation to anyone in the province and increase the limits.

Class E is limited by proximity to a Class A or B facility and by the feasibility study process. I believe that no producer should be forced to use the services of an abattoir simply because of its geographic proximity to the producer. There are many

other important considerations including animal-welfare, service and quality of work, which may influence a producer to wish to slaughter their animals on site. Furthermore, the requirement to “attach a letter from regional or municipal authority

confirming no bylaws or restrictions would prevent slaughter on the farm/property” can stop an application in its tracks due entirely to bureaucratic inefficiency. Often, municipal government workers do not have any knowledge of the relevant

bylaws or may not be forthcoming with the required documentation even if they are. It should be enough that the producer has checked and confirmed that there are no relevant bylaws. Furthermore, there is the question whether some municipal

bylaws contravene a farm’s right to process their own animals which is protected under BC’s Farm Practices Protection Act which defines a farm operation as: (k) processing or direct marketing by a farmer of one or both of

(i) the products of a farm owned or operated by the farmer, and

(ii) within limits prescribed by the minister, products not of that farm, to the extent that the processing or marketing of those products is conducted on the farmer's farm;

The "time-limited" condition on Class E licenses is also problematic and may result in a producer losing their license simply because a new facility has opened within two hours of their location. This is punitive and unfair as most producers

would be required to invest considerable time/resources in order to be able to slaughter their own animals and it isn't reasonable that once given, this license should not be renewed for this reason.

The "seasonal slaughter" condition is problematic for similar reasons. It takes the same amount of capital to get set up to slaughter safely once a year as it does to slaughter safely year round. It's either safe or it isn't. It doesn't suddenly

become unsafe for part of the year just because the local abattoir has capacity at a given time.

The current system of regulatory oversight provided by the Regional Health Authorities sets up a two-tiered system whereby Class A & B facilities are under Provincial and/or Federal jurisdiction but Class D & E licensees are under their Regional

Health Authority. I would like to see ALL classes overseen by the same authority. I would support more regulatory oversight, particularly with regards to Class D and especially if the limits are increased/eliminated.

I would also be in favour of greater traceability and more ongoing support for licensees including online resources/training, on-site visits, phone and online support and funding.

The current Slaughter Safe training is sufficient but could benefit greatly from putting the whole course online where multimedia resources could be used for educational purposes and address timing and geographical constraints. It could also

dramatically reduce the cost of implementation.

Additional online databases of common parasites, their presentations and actions required, with links to more information, for example, would be very beneficial. Videos, animations, even interactive content could enrich the course and offer

information that is difficult to present in the current format. It would also make the course more accessible to a larger number of people, especially those in more remote areas. An online platform would also act as an ongoing resource for licensees

which would be valuable, particularly for those who may slaughter only infrequently and benefit from a refresher.

One area of concern is the lack of education and oversight with regards to the actual slaughter process. An online platform would better allow for the demonstration of proper slaughter techniques but demonstration of good technique should be a

requirement before issuing a license. This could be accomplished by having an inspector on site at the licensee's first kill, or perhaps by having the licensee participate in a kill at another licensed facility with sign off from another licensee or even someone from our Association."

"Should be expanded to allow for on site butchering of one's own meat for public sales. There are less and less facilities to accommodate and is extremely cost prohibitive, especially here on the Sunshine Coast to travel with livestock to have them processed and butchered. To help small farms be sustainable in this community and for the type of care we take in insuring our animals are treated kindly from start to finish including on site slaughter, it would be extremely valuable if there was an approval process to keep these activities on site."

"Those interested in obtaining a Class D license shouldn't be excluded due to living in a particular area. At the minimum, they should be able to submit Feasibility Studies and be considered on a case by case basis.

The requirement that any new Class E licensees cannot be within a 2 hour radius of another abattoir needs to be changed. Farmers shouldn't be forced to use a particular abattoir only because of the geographical location. Many farmers cannot justify the 2 hour travel time (which is multiplied when including return trips, additional trips for more animals). Consumers are demanding meat that is raised and processed in the most humane way possible, and adding a stressful day of travel followed by slaughter at an unfamiliar place, is not most consumers' idea of humane."

"We think we may be a good fit for a class E license but since we live in the nondesignated area our fate has been pre-determined that we would not qualify."

"I believe we need to allow all areas of the province to have the option of obtaining these licenses. There is a major shortage of abattoirs everywhere. There also need to be more fluid bylaws and regulations between provincial government and local districts to allow these activities."

"I believe Class D and E licenses should be open to all small farms in BC no matter where their location

I feel under a class D you should be able to sell outside of your regional district. I live outside a large city and feel I shouldn't be limited to not being able to sell here.

Large processors are continually closing their doors to small scale farms or have outrageous minimum order quantities (ie: 3000 broilers per order) which is making it more and more difficult for small scale farmers.

Large processors are so booked up it's becoming more and more difficult to book in dates for animal processing. I have to book pigs 8 months in advance

I feel the amounts under a class D should be increased to match "direct vendor" permits or quota of the farm ie: 300 turkeys as set by BC Turkey Marketing Board, 2000 broilers by BC Chicken Marketing Board or quota amounts if they have been granted

I feel there should be more training given to Health Inspectors operating this program as it seems there are different parameters depending who you speak with”

“They're very difficult to obtain, especially if you live in an area within close proximity of a licensed facility. Problems with licensed facilities: -very difficult to book into -you have to pack up the animals and transport them, (specifically poultry), which is very stressful for the animals, which is very negative for the animals welfare in our opinion - we raise heritage breeds which don't 'finish' within the the allotted time required for the abattoir. An example is the heritage turkey's that we raise, and the fact that they take 9+months to grow into a product that we can market, and sell successfully. The abattoirs maximum age for turkeys is 22 weeks. -Having to process through licensed facilities removes the product margin that a business needs to be successful (costs to get product to/from facility, plus processing costs). If this government wants farmers to be successful, there needs to be regulations that enable farmers to actually make a margin.”

Question 4: Right now, how familiar are you with the regulations about Class D and E licences?

Industry Associations			SSMPA Members		
Responses	# of Responses	% of Responses	Responses	# of Responses	% of Responses
Very Familiar	3	60.00%	Very Familiar	2	18.18%
Familiar	2	40.00%	Familiar	8	72.73%
Neutral	0	0.00%	Neutral	0	0.00%
Unfamiliar	0	0.00%	Unfamiliar	0	0.00%
Very Unfamiliar	0	0.00%	Very Unfamiliar	1	9.09%
Total	5	100.00%	Total	11	100.00%

Question 5: Under the Meat Inspection Regulation, an animal unit is 1,000lbs. How satisfied are you with the amount of animals D and E licensees can slaughter per year (E 10 animal units, D 25 animal units).

Industry Associations			SSMPA Members		
Responses	# of Responses	% of Responses	Responses	# of Responses	% of Responses
Very Satisfied	0	0.00%	Very Satisfied	0	0.00%
Satisfied	1	20.00%	Satisfied	1	9.09%
Neutral	1	20.00%	Neutral	2	18.18%
Unsatisfied	1	20.00%	Unsatisfied	3	27.27%
Very Unsatisfied	2	40.00%	Very Unsatisfied	5	45.45%
Total	5	100.00%	Total	11	100.00%

Question 6: If you answered "Unsatisfied" or "Very Unsatisfied" to Q5 – what limits would you think are acceptable and why?

Industry Associations:

“Poultry:

One licensed E abattoir can process 10,000 pounds (4540 kgs) of chicken which equates to approximately 2,000 birds (using an average of 5 lb finished weight per bird). The average consumption (Stats Canada 2009) of poultry is 13.4 kgs per person per year. The potential reach of 10,000 (4540 kgs) pounds of uninspected poultry is then approximately 340 people. Each Class D abattoirs can process 25,000 pounds (11,340 kgs) and could reach 850 people.

Beef:

One licensed E abattoir can process 10,000 pounds (4540 kgs) of beef equates to approximately 10 cattle. The average consumption of red meat in Canada (Stats Canada 2009) is 23.4 kgs per person per year. The potential reach of 10,000 pounds of uninspected beef is 194 people. Each Class D abattoirs can process 25,000 pounds could reach 485 people.

The volumes per uninspected abattoir are high enough to pose a food outbreak risk. If something were to go wrong, it would have a devastating impact on the health of BC residents and the province’s economy. If Class D and E abattoirs are to continue, then we would like to see their limits decrease and by no means increase.

As an additional concern, there is inadequate (or no) oversight to ensure that each of the Class D and E abattoirs are processing within their required limits and sales channels or respecting animal ownership rules.”

“[] feels that the amount of animals able to be slaughtered per year by Class D and E licensees is sufficient. Most importantly, [] feels that the numbers are not as relevant as the safety standards that Class D and E licences need to be held accountable too.

Basing animal units on species (i.e. 100 chickens, 10 steers) is a simple and effective way to regulate how much a licensee can butcher. Not all licensees may be effective at estimating weight of an animal, and this would assist in a simple and effective way to establish how many animals would be processed through their facilities.”

“Smaller slaughter limits will at least create a stepping stone to higher production.

The fact that D/E license holders are requesting higher limits points to the ability for D/E licenses to stimulate the industry as a whole.

Flexibility and the ability to accommodate for special circumstances and local conditions is ideal.

The number of animals being processed must be enough that the costs of establishing and running a facility is feasible (more regulatory costs=higher animal limits”

“The limits are too low and do not allow a producer to process enough animals to earn a living or to earn enough profit to justify the expense of setting up the infrastructure required to do so safely and efficiently. We propose that the limits for Class E be increased to the current Class D limit and that Class D limits be assigned on a case-by-case basis based on capacity/ability.”

SSMPA Members:

“A market weight pig is 250 lbs.”

“Not sure but we struggle having our animals processed because there are limited op”

“I think that the limits should be set on a farm basis.

There should be a list of parameters including facilities, capacity, timing that a farm should establish and then they get their license based on those.

Each farm should submit a detailed plan with regards to their on-farm slaughter procedures. They should be inspected and then the poundage should be determined.”

“I think it should be unlimited, but an inspector should be present for slaughter. There could be a floating inspector that covered these licenses and made sure all these little mom and pop operations where practicing good animal welfare and food safe practices, people might mean well but for the most part are ignorant. Inspect them!”

“The limits are too low and do not allow a producer to process enough animals to earn a living or to earn enough profit to justify the expense of setting up the infrastructure required to do so safely and efficiently. The limits for Class E should be increased to the current Class D limit and that Class D limits should be assigned on a case-by-case basis based on capacity/ability.”

“I think the Class E limits are acceptable, and should be maintained to continue to make the Class E a viable alternative for the smallest producers.

The Class D limits should be increased, so that small scale producers can raise and reliably process enough livestock to make their business feasible. 100 animal units is a reasonable number to start with, as it is achievable by a small local butcher facility without the requirement of extensive infrastructure. Perhaps the number could be monitored and reconsidered every couple of years?”

“Higher limit is needed to allow a small farmer to actually make a living.”

“I feel a Class E should be increased to the Class D limitations and a class D

should be viewed more as a Class B but being for uninspected meat. I feel the . amounts set are not enough for a small scale farmer to make a living solely on the farm.”

Question 7: Do you think the animal units should be based on species type, rather than weight? (for example: 100 chickens, 10 cows)

Industry Associations			SSMPA Members		
Responses	# of Responses	% of Responses	Responses	# of Responses	% of Responses
Yes	4	100.00%	Yes	9	81.82%
No	0	0.00%	No	2	18.18%
Total	4	100.00%	Total	11	100.00%

Question 8: Are you satisfied with the level of regulatory oversight currently provided by the Regional Health Authorities?

Industry Associations			SSMPA Members		
Responses	# of Responses	% of Responses	Responses	# of Responses	% of Responses
Yes	0	0.00%	Yes	6	54.55%
No	4	100.00%	No	5	45.45%
Total	4	100.00%	Total	11	100.00%

Question 9: If you answered "No" to Q8, please explain:

Industry Associations:

“The various regions have different levels of support for these licences. Some have good information on their websites and good support. Some do not.”

“The Ministry of Health, Health Authorities and Environmental Health Inspectors are not adequately trained on the specifics of ensuring safe meat is sold to consumers. They are not present during the slaughter process to provide un-biased 3rd party oversight to look for animal welfare issues, to perform ante and post mortem inspection to ensure the animal is fit for human consumption and meat that is not fit is removed from the food chain. As experience has shown, reading food safety and sanitation standard operating procedures does not reflect what actually happens when processing animals for meat. Further, inspecting a facility while not operating gives no indication as to whether proper animal handling, stunning, bleeding, contamination removal and sanitation occurs on an on-going as-needed basis.

The Health Authorities are not adequately trained to review records to ensure that all mandatory movement reporting, tag retiring, specified risk material handling, zoonotic diseases, animal diseases, animal ownership verification, etc. are being done correctly or at all. An on-site inspector, who although may not be directly responsible for enforcing these regulations, records any deviations and contacts the corresponding regulatory body to follow up. In Canada, there are over 30 reportable zoonotic diseases (<http://www.inspection.gc.ca/animals/terrestrial-animals/diseases/reportable/eng/1303768471142/1303768544412>) and it is beyond most of the on-farm slaughter facility’s training to correctly identify these diseases. This would have a devastating affect on both consumers and the entire meat industry in Canada.

Since Environmental Health Officers are not present when animals are being slaughtered at uninspected abattoirs, they are not able to ensure that the following regulations are being met:

Canadian Food Inspection Agency (CFIA) Regulations

The CFIA enforces a number of regulations, both from the CFIA itself, as well as livestock producer groups and Health Canada. These regulations include tracking any animal disease outbreak which affects all livestock producers, as well as zoonotic diseases which affect the consumer. Without on-going 3rd party oversight, there is no assurance that these requirements are met. The CFIA relies on the support of the provincial Ministry of Agriculture Meat Inspectors to ensure that these regulations are being followed. The CFIA has overarching oversight on all food produced, imported and consumed in Canada

CFIA Oversees:

- Animal tag retirement and animal movement reporting
- Correct handling, transport and disposal of Specified Risk Material (BSE) to protect consumers, the country's international reputation and the export market for beef
- Tracking reportable animal diseases to protect the livestock industry in Canada
- Tracking zoonotic diseases to protect consumers
- On-farm animal welfare and humane transport
- Labeling, product testing aw, ph, pathogen testing, traceability and recall of unsafe products from all sources.

Other regulatory bodies:

- Canada Beef's mandatory collection and remittance of Beef Checkoff money for each beef animal slaughtered in Canada
- Ownership Identification (OII) that validates animal ownership
- Poultry marketing boards to track quota
- The Ministry Health and Health Authorities which oversee further processing of meat and water potability
- The Ministry of Environment which ensures both liquid and solid waste is handled correctly and in an environmentally sustainable manner

The importance of 3rd party on-site inspection:

- Identification and reporting animal welfare issues that may have occurred at the producer's farm

- Identification and reporting of animal diseases to protect the livestock industry
- Identification, reporting and handling of zoonotic and reportable diseases to protect consumers
- Identification of meat that is not fit for human consumption and removing it from the food chain
- Ensuring humane handling, food safety and sanitation on an on-going basis during slaughter
- Ensuring that traceability systems are in place both from the live animal side and the consumer side

We suggest investigating the possibility that the Class D and E licence holders be brought under the Ministry of Agriculture and have on-site inspection, if not all the time (best scenario), then at least on a regular basis to check slaughter records and ensure complete compliance with animal welfare, food safety, sanitation, reporting, remitting, waste handling, etc.”

“[] would encourage that all licences be regulated by one governing body, most particularly the Ministry of Agriculture. Having all licensees under one governing body would assist in effective food safety and animal welfare, consistent quality of meat products entering the market, and effective traceability programs, all of which would assist in continuing to build public trust.

More training and education is always paramount to []. With the public being farther removed from agricultural production and practice, and a growing trend for urban dwellers moving rurally to help minimize cost of living, education on how to correctly and humanely slaughter animals is extremely important to []. Ensuring that new licensees are properly trained and educated, should be a major focus of any updated regulations to Class D and E. Including continuing education, particularly as new research presents more humane slaughter opportunities, should also be considered in any updated regulations.”

“Lacking enough information to answer definitively

the level of regulatory oversight is not clearly explained and standardized around the Province.

If regulatory oversight for Class D/E licenses were through the same body as for Class A/B licenses, there would be better accountability, oversight, and understanding about the industry for the Province, for industry associations, for Producers, and for the public.”

“The current system of regulatory oversight provided by the Regional Health Authorities sets up a two-tiered system whereby Class A & B facilities are under Provincial and/or Federal jurisdiction but Class D & E licensees are under their Regional Health Authority. We would like to see ALL classes overseen by the same authority. We would support more regulatory oversight, particularly with regards to Class D and especially if the limits are increased/eliminated.

We would also be in favour of greater traceability and more ongoing support for licensees including online resources/training, on-site visits, phone and online support and funding.”

SSMPA Members:

“Not sure about the amount of oversight”

“Regional Health Authorities should help farmers develop their slaughter/facility plans instead of regulating and inhibiting.

The process starts with a "no" and then you have to fight to get a "yes".

It is problematic.

On-site slaughter operations should be inspected by people who understand the realities of farming/ranching”

“The regional health authorities aren't trained in animal welfare standards a thats pretty important in my mind. All licenses should be regulated through the ministry of Ag and inspectors should also do a better job of calling out bad practices.”

“The current system of regulatory oversight provided by the Regional Health Authorities sets up a two-tiered system whereby Class A & B facilities are under Provincial and/or Federal jurisdiction but Class D & E licensees are under their Regional Health Authority. I would like to see ALL classes overseen by the same authority. I would support more regulatory oversight, particularly with regards to Class D and especially if the limits are increased/eliminated. I would also be in favour or greater traceability and more ongoing support for licensees including online resources/training, on-site visits, phone and online support and funding”

“When I completed my slaughter safe course I felt it was rushed through. I also feel there isn't enough familiarity with the program province wide”

Question 10: Do you think Class D and E licensees would benefit from more training? For example, training in humane slaughter, best practices or response to outbreaks?

Industry Associations			SSMPA Members		
Responses	# of Responses	% of Responses	Responses	# of Responses	% of Responses
Yes	5	100.00%	Yes	10	100.00%
No	0	0.00%	No	0	0.00%
Total	5	100.00%	Total	11	100.00%

Question 11: If Class D and E licensees were subject to more regulatory oversight, would you agree that more Class D and E licences should be allowed?

Industry Associations			SSMPA Members		
Responses	# of Responses	% of Responses	Responses	# of Responses	% of Responses
Yes	4	80.00%	Yes	9	100.00%
No	1	20.00%	No	0	0.00%
Total	5	100.00%	Total	9	100.00%

Question 12: Class D licences are only available in designated rural areas as specified in the Meat Inspection Regulation, under the *Food Safety Act*. Should more areas be designated? Please explain.

Industry Associations:

“Each application should be on a case by case basis, and should go back to the boundaries before the meat regulations were changed.”

“No, more areas should not be designated.”

The federal government has a mandate to provide safe food for all Canadians, including British Columbians. Current Class D and E licenses go against this mandate by allowing uninspected meat for sale to the general public. Many consumers are not aware that what they are buying is uninspected, or what that really means. Past efforts have failed to stop uninspected abattoirs in BC, and while [] maintains the position that all abattoirs should have on-site, on-going 3rd party meat inspection, it recognizes that efforts to stop it in the past have failed.

If the provincial government is determined to continue allowing consumers to buy uninspected meat, then inspected Class A and B abattoirs, federal abattoirs, chefs and retailers do not want the rules relaxed for uninspected facilities. This includes the volume allowed, the locations where the meat can be sold or the location of the uninspected facilities (designated areas or within 2 hours of an inspected facility). The meat must at all times be clearly shown to be uninspected with information provided to the consumer as to what that means – i.e. what meat inspection does for food security and health.

Expanding uninspected licenses will put the health of BC consumers and livestock producers at risk and could have far-reaching impact on the reputation of Canada. We suggest investigating the provision of 3rd party inspection during operating time, if not every time which is highly recommended, then at least on a regular basis.

Scenarios

Zoonotic Disease: An American tourist buys some uninspected beef at a farmer’s market and develops Creutzfeldt-Jakob disease. It is traced back to BC. The entire Canadian beef export business shuts down. Tourism plunges. Canada loses its global respect.

- A recent outbreak of bovine tuberculosis in southern Alberta resulted in BC Meat Inspectors taking enhanced precautions and worked closely with CFIA personnel to ensure no cattle processed at inspected facilities entered the human food chain.

Animal Disease: March 2018: “Rabbit haemorrhagic disease is an extremely infectious and lethal disease of rabbits. It is the third confirmed diagnosis of this virus in Canada, and the first in British Columbia. The disease is exclusive to rabbits. Rabbit owners should take precautions when disposing of any rabbit remains and contact their veterinarian for more information.”

Building Codes Rescinded

What if we relax the building code because too many people are waiting for their houses to be built?

- Suddenly anyone can frame, gas fit or electrically wire after taking a 1-day course
- Those companies that had a license when the code was enforced still need to meet the code; new ones don't

"[] agrees that if there was oversight from the same governing body as other class licences that increasing the number of Class D and E would be effective and beneficial. Regulations are costly to comply with, and all classes need to be subject to the same regulations to support animal welfare, education of licensees, economic development and food safety.

[] feels that more areas should be strategically considered, as the urban population begins to move into areas that are more rural. As rural areas slowly see an increase in population, there will be more interest in licences and therefore future economic growth should be considered. In addition to increased populations in rural areas, current livestock producers need to have access to safe slaughter facilities that allow for business growth."

"Yes, producers from all regions of the Province should be able to apply for Class D/E licenses. We should not have double standards.

- According to the person who developed them, the guidelines of 2 hours transport time from a Class A/B facility were established somewhat arbitrarily. They do not take into account the state of the roads being traveled, and delays due to accidents or weather.
- Farmers will be able to continue to do the work of their traditional livelihoods, rather than having to contract out services
- Slaughter costs will be reduced, particularly in areas requiring long transport times to existing facilities, increasing the viability of farming
- It is simply financially unfeasible to engage in long transport times and return trips to a distant processor for small numbers of animals or carcass weights.
- It will encourage new entrants, particularly small producers who may subsequently increase their production
- There will be no competitive disadvantage to farmers who currently have to transport out of their region for slaughter.
- Reduced transport times will result in reduced stress on livestock and a resulting increased quality of meat
- Existing Class A/B facilities have very long wait times for service - expansion of D/E licenses will reduce seasonal challenges and ensure producers have access to slaughter services when they need it.
- Offers an opportunity for local marketing/branding initiatives

- Would assist communities to transition to A/B facilities by stimulating production
- Traditional skills will be used, fostered, and shared within a community
- Fewer producers will slaughter livestock illegally and without any oversight
- It would allow producers independence and autonomy within a solid regulatory framework
- Fossil fuel consumption would be reduced
- Spread of pathogens and disease through different geographical regions would be reduced
- Producers would increase production if slaughter capacity was increased and available locally or on farm
- It would stimulate development of slaughter capacity at a lower cost than Class A/B facility”

“The regional restrictions are impractical. We believe that anyone in BC who wants to apply for a Class D or E licence, should be able to, regardless of their geographic location or their proximity to a Class A or B facility. They should also be able to sell their product anywhere in the province.

Class D is currently limited to 10 designated regional districts. The majority of our membership is in non-designated regional districts and as such, do not qualify for a Class D license. Without a Class D license, you cannot sell to wholesale/resale buyers. These are the ideal client for someone doing on-farm slaughter, as these clients will most often take the whole animal with no further processing required. Assuming the limits for Class D could be increased, a farmer or rancher could reasonably expect to be able to earn a living doing on-farm slaughter and selling to these types of clients directly without having to deal with the further complication of cut and wrap. The easiest way to reduce the pressure on local abattoirs and increase the viability of small-scale meat producing businesses would be to open up the Class D designation to anyone in the province and increase the limits.”

SSMPA Members:

“Yes they should. One of the biggest problems is a lack of government licenced abattoirs.”

“Not sure”

“It should be allowed everywhere.

Our farm is within 2 hrs of an abattoir so we have not been able to obtain a license thus far.

We are a small operation.

Financially, driving 4 hrs with trailer, loading the pigs, etc costs the farm an estimated \$890 to get 5 pigs slaughtered (average number for us). That is \$175 per pigs. This number is based on the carcasses being

delivered directly to a butcher shop. If we process the meat ourselves, we need to drive back to [] to pick it up and it adds another \$350, hence \$245 per hog.

We sell our pigs around \$700 each.

The math does not add up.

Centralizing processing is killing smallholding. Having animals on farm in integrated crop-habitat-livestock systems is at the very heart of sustainable ecosystems. The current regulations preclude small farms from getting animals to reduce their machinery use, help with pest mngt and recycle nutrients. It pushes farms towards more specialization which has very much been established as detrimental to water, soils and atmosphere.

The ability to process animals that you have raised to outstanding standards yourself is at the heart of the craft. SHOW ME EXAMPLES OF SMALL FARM MEAT THAT HAS POISONED PEOPLE? You can't.

I have about 20 peer-reviewed articles on my computer proving that small-scale operations incur less food safety risks than large operations. I am happy to send those to you."

"Yes, our current abattoirs are getting away with increasing prices to whatever they please. We can't get our animals slaughtered when we want them to be slaughtered. []"

"The current Slaughter Safe training is sufficient but could benefit greatly from putting the whole course online where multimedia resources could be used for educational purposes and address timing and geographical constraints. It could also dramatically reduce the cost of implementation.

Additional online databases of common parasites, their presentations and actions required, with links to more information, for example, would be very beneficial. Videos, animations, even interactive content could enrich the course and offer information that is difficult to present in the current format. It would also make the course more accessible to a larger number of people, especially those in more remote areas. An online platform would also act as an ongoing resource for licensees which would be valuable, particularly for those who may slaughter only infrequently and benefit from a refresher.

One area of concern is the lack of education and oversight with regards to the actual slaughter process. An online platform would better allow for the demonstration of proper slaughter techniques but demonstration of good technique should be a requirement before issuing a license. This could be accomplished by having an inspector on site at the licensees first kill, or perhaps by having the licensee participate in a kill at another licensed facility with sign off from another licensee or even someone from our Association."

"Yes."

"Yes. There are more rural areas than not in BC, including regions that involve mountain passes in every direction.

I think the Class D license could be made available to more areas, and should be further differentiated from Class E licenses by having an increased slaughter limit, possibility to ship to different regions in the province, and requiring a higher level of training on the part of the licensee. It is my opinion that the ongoing cost of inspection could be reduced if more funding was put towards training of licensees. ”

“Yes - we do not think that just because we live within 2 hrs of an abattoir that it is a good fit. This limits the capacity of some small farms. We are at the mercy of the abattoir's pricing and because of this we may not be able to continue our broiler operation over the long term - we have one option and it currently costs us a minimum of \$7 per chicken. Being able to slaughter on-farm would benefit some small farms financially and they'd be able to produce a much better product. ”

“Yes”

“I feel this should be offered province wide. Many small scale farmers do not like

putting their products into the hands of other as mistake are a common occurrence in processors and butchers [] I also feel with the distances small scale farmers have to travel to get their meats processed is unacceptable and puts added stress on the animals as well as the farmers. Weather can be a factor and unsafe but we push through knowing if we don;t we may not get our animals booked in again for while increasing our costs.”

“Absolutely. In an effort to promote local food, reduced carbon footprints, and all the benefits of community, farmers should not be limited to the markets available. Retail establishments / restaurants should be able to purchase products directly off the farm.”

Question 13: Finally, we would like to give you the opportunity to provide any general comments and observations about your experience relating to Class D and E licences.

Industry Associations:

“Class D and E licences are a good way to allow for local meat production and access to local meat, with some oversight and training. It would have been helpful to have some statistical information to review prior to this survey. I would like to know how we are doing in food safety as producers and processors.

I also see a good link to programs such as the Canadian Verified Sheep Program, which links food safety, animal care or welfare and biosecurity in a package for producers that provides training, and is audited, to provide certification that producers are doing the right thing.”

“It is very difficult to reflect all the concerns of the current Class A and B abattoirs in this province as well as the Federal abattoirs, chefs, retailers, butcher shops and livestock producers that are members of the []. This response attempts to capture the major concerns, but each abattoir is unique.

This consultation process does not address the underlying reasons for the shortage in abattoir processing capacity, which include a lack of skilled labour, the imbalance in the seasonality of demand for capacity, or the fact that the capacity issue is not with slaughter, but rather the cut and wrap and further processing. The BC Association of Abattoirs undertook a Labour Market Partnership – Sector Engagement study that brought together the labour concerns of both abattoirs and independent butcher shops and clearly shows a need for trained workers at both abattoirs and butcher shops. It also showed the need to spread the demand throughout the year, rather than having it concentrated in the months between August and January for red meat, and April to October for poultry. Consumers want access to fresh meat throughout the year and if they are unable to get it locally, they buy imported products.

Allowing the expansion of D and E slaughter capacity does not address any of the major issues facing the buy-local meat industry in BC. Under current regulations, only BC provincial class A, B, and BC federal abattoirs are able to process other's animals and allow them for sale to restaurants and stores throughout BC. Opening up the D and E licences will cause these compliant abattoirs to have further reduced profits, making them unviable and could potentially cause them to shut down. All the small producers that do not want to slaughter their own animals will then have less of a choice of where to get their animals processed and would result in a reduction, rather than an expansion, of access to local meats. Or worse still, there will be an increase in illegal slaughter operations where there is no oversight or control at all.

The majority consumers are not aware that they can purchase uninspected meat; most believe that BC adheres to the national and international standards of safe food. While many of the D and E operations may meet these international expectations, without 3rd party on-site inspection, violations could occur without intention. Meat processing involves specific food safety activities beyond other types of food. When dealing with live animals, there are reportable animal diseases, zoonotic diseases and some labour-intensive activities to remove contamination and meat not fit for human consumption. There is less incentive to remove a bruise properly if it involves 'cutting' into profits. On-site meat inspectors ensure meat not fit for human consumption does not enter the food chain.

Consumers are also not aware of the difference between being a licenced (e.g. D or E Class) or an inspected (Class A, B or Federal) abattoir. Again, the consumer's expectation is that if it is licenced, it must be inspected. At a farmer's market, meat from both a Class E and A may be available for sale; both claim to be licenced but unless the Class A further indicates that it is fully inspected, the buyer may not understand why the price of meat is higher for the Class A.

The meat from a fully inspected abattoir is likely to cost more as a result of the federally and provincially enforced reporting requirements. These include reporting animal movement, retiring tags, contacting Ownership Identification to verify ownership, dealing with Specified Risk Material, meeting food safety and sanitation requirements, meeting environmental regulations, ALC regulations, as well as collecting and remitting fees and information for livestock/poultry producer associations. In addition to collecting and remitting fees, these activities all take time and most of the BC Class A and B abattoirs are small, family owned operations and the owners not only participate in the abattoirs physical activities, but are

also responsible for the administrative load imposed by collection, remittance and reporting. While these activities are also required at Class D and E facilities, there is no adequate confirmation of the paperwork to ensure regulations are met.

Once an animal dies, their immune system is no longer active which means that any contamination left on the carcass, whether it be hair, ingesta, fecal matter, bruises, necrotic tissue or a simple sliver, will become a breeding ground for bacteria. The best food-safe way to remove this contamination is to trim it off; washing only further spreads the contamination. Proper and immediate chilling, as well as the cold-chain for further handling, is extremely important to further reduce the bacterial load on the meat.

Handling a live animal for stunning is considerably different than handling an animal for pasture rotation, inoculation or tagging. As with all things, experience is important. Transporting an animal may cause stress, but this stress is considerably less than mishandling during stunning and bleeding. While all aspects of meat processing are important, it is the trained and experienced stunner that ensures the process starts correctly. Also, while most small-scale livestock producers have the best of intentions, each inspected abattoir and Meat Inspector can cite too many examples of animals arriving that were obviously mis-handled at the farm/ranch, not properly fed, de-wormed or housed. This is a major animal welfare concern and without adequate 3rd party oversight it will be allowed to continue.

While studies have shown that most mis-handling of food occurs once in the consumer's hands, this does not mean that any less attention should be paid pre-consumer; but rather more attention is necessary. There is a plethora of data that shows a reduction in foodborne illnesses as a result of on-site 3rd party inspection. The countries that do not have adequate control over their food safety have a much higher incidence of illness and death related to food consumption.

Again, it is important to stress that the capacity issue in BC is mainly with cutting, wrapping and further processing, not with slaughter.

Some of the concerns raised by small scale livestock producers in BC are not unique to this province. The following table is reproduced from a U.S. report by Lauren Gwin and Arion Thiboumerly, "Local Meat Processing – Business Strategies and Policy Angles".

As a size comparison, put together all the Class A and B abattoirs in BC and they process approximately 26,000 beef animals. One Cargill plant in High River Alberta processes 4,500 beef animals per day which means that in less than 6 days, this one plant processes more than all the abattoirs in BC. There is a capacity issue with the small abattoirs in BC, but rather than allowing more uninspected abattoirs, more effort should be made to help those that are already processing inspected meat to expand.

Capacity Issues

- Need to do detailed study to determine what is best for building meat processing capacity in the province
- Increasing uninspected abattoirs is a short sighted hinderance to building food security, not a fix
- Capacity issues are mainly with cut, wrap and further processing. Not with slaughter.

- Some capacity issues are often booking issues – livestock producers bringing too many animals, too few, not planning ahead, or not showing up when scheduled
- The fall busy season, when A/B's are at full capacity, is when money is made by them; it is also when the small producer wants their animals done and they are unwilling to plan production for the shoulder season
- Producers should be developing finishing schedules throughout the year to enable BC consumers access to fresh meat, not just frozen

Animal welfare

- Many animal welfare issues arise from the producers themselves and is noticed, reported and dealt with at the inspected abattoirs
- This can also take the form of poorly nourished and housed animals, poor handling during loading at the producers, etc. This is only confirmed by a third party at an inspected facility
- No one is checking that actual handling and stunning are correctly and humanely done
- A/B plants care deeply about animals and their welfare

Food Safety

- Food safety is enhanced when a third party provides oversight. Relying on the person who raised the animal, has a vested interest in making money from it, is a conflict of interest. While many people want to make the right decision, it doesn't always happen.
- Frequently comments are made "I didn't see anything wrong, but the inspector noticed a small bruise which turned out to be an indication of a bigger issue. The animal was deemed not fit for human consumption and condemned"
- How can the public be reassured that good food safety and animal welfare practices are met, the meat is fit for human consumption, all federal regulations have been met as well as all international expectations unless there is more than just taking a one-day course with no oversight during operations?

The BC Abattoir Profile

- The current A/B licence holders are seen as "centralized processing facilities" and "larger" which leads to the misconception that they are all the size of Cargill and JBS.
- They actually range from 1-person operations to 150. The average is less than 10 full time positions
 - For a scale, approximately 26,000 beef animals are slaughtered at A/B licensed facilities per year; one Cargill plant in Lethbridge does 4,500 per day.
 - Owners are husband-wife; mother-daughter; brothers and sisters. Some are multi-generational
 - These are family operations – located on their own properties as a main or supplemental source of farm income.
 - Most A/B are on ALR land and have taken the time to get approval from the ALC to operate a primary agriculture processing facility to help BC meet the goal of providing safe meat for BC consumers
- A/B facilities encourage small ALR land holders to raise animals in order to sell inspected meat to BC consumers. This means ALR land is being used for agricultural practices.

- If there was nowhere for these small producers to take their animals, the land may not be used as intended. Not everyone wants to slaughter their own animals.
- Main capacity issues occur with cut, wrap and further processing
- There is a lack of trained workers for the industry

An un-level field may cause A/B abattoirs to shut down – then who will do others’ animals? And how will we ensure safe meat for BC consumers?

- Class A/B plants have taken the effort to become licensed and inspected and to comply with national regulations and international expectations
- Using the introduction of meat inspection for a reduction in beef processing cannot be proven. Across Canada beef production has dropped over the same time period. Even in Ontario, where mandatory inspection was introduced in 1992, long before it was brought into BC. It is illegal to sell any uninspected meat in Ontario and the other provinces as per an agreement signed by all provinces to get our borders open in the BSE crisis
- All livestock production, with the exception of poultry, has decreased across the country. The trend in BC is no different.
- Customers and the general public are not aware that they could potentially be buying uninspected meat – or understand what the difference is between being licenced and fully inspected
- Class A/B operators have taken the time and invested money to follow the rules and regulation; opening up the field doesn’t make it level.

Why not be inspected?

- What do they want to conceal, what makes them feel that they are better at food safety, traceability, pathology and processing?
- Do they fully understand what inspection involves and the true advantages of having an Inspector with their industry insight and experience?
- While we sympathize with the producers who want the ability to process their own animals, we need (as does the consuming public) concrete assurance that humane handling practices, animal health, pathology and food safety practices are followed
- Only when you see an abattoir actually operating can you confirm good practices are being followed. Looking at a facility while it is not operating only gives an indication, not the reality
- Becoming inspected would mean better access to markets and would truly help with BC capacity building

Suggestion:

How about licencing trained, qualified butcher shops/meat cutters in procedures and code of practices, that go to people’s property, slaughter the owner’s animal on site, bury all the waste on site, transport the carcass to their cutting facility, cut and wrap it and then deliver it back to only be consumed by the person who owned the animal and their immediate family. This would alleviate the backlog at inspected abattoirs and allow smaller producers access to inspection.

The [] would like reassurance if Class D and E abattoirs continue that third party oversight ensures:

- That they are staying within their volume, allowed sales location and chain
- That animal welfare and humane handling practices are met
- That good food safety practices are met
- That beef and lamb tags are retired
- That pigs are being reported to PigTrace Canada
- That poultry information is being reported to regulatory bodies
- That animal ownership is confirmed
- That SRMs are being handled and disposed of as per CFIA regulations and international expectations
- That Beef Checkoff money is collected and remitted as per federal mandate
- That all waste is handled as per Ministry of the Environment regulations
- That zoonotic diseases are properly identified and reported
- That meat not fit for human consumption does not enter the food chain
- That they have adequate training in proper procedures to ensure animals are humanely treated, food safety practices are followed, reporting regulations are met, zoonotic diseases are reported, etc.
- That adequate records are kept
- That D/E's have liability insurance for selling uninspected meat and provide yearly proof of insurance for licence renewal

Failure to meet internationally recognized standards at a D or E licenced facility would devastate the entire industry.”

“[] thanks the Ministry for diligently working to improve the slaughter capacity within British Columbia and would stress that any changes to the licences include:

1. Increased training to all licence holders to assist in public trust and perception.
2. Increased on-farm food safety and food handling procedures and programs to assist in public trust and perception.

[] looks forward to future discussions on Class D and E licences and would be happy to provide more feedback if required.”

“There is evidence that small on-farm slaughter facilities may expand their operations over time.

Expansion to Class D/E licenses have been requested numerous times via UBCM and the BC Chamber of Commerce

Producers are frustrated with not being able to do their traditional work, not being able to access timely slaughter services, and the increased cost of doing business because of long travel times.

Livestock production is in decline.

Producers are requesting a secure stepping stone on the path to higher production levels and profitability.

The local food movement continues to grow. Consumers are concerned with long transport times and stress to livestock. They want local farm to table food that has a minimal ecological impact, direct contact with the producer, and as few middle men as possible.

There have been no disease outbreaks from Class D/E facilities, and a government commissioned report states that proper on-farm facilities do not pose a health risk.

Through conversations with both, it does not appear that there is currently adequate information sharing and understanding about licensing processes and requirements between the Ministries of Health and Agriculture”

“Class E is limited by proximity to a Class A or B facility and by the feasibility study process. We believe that no producer should be forced to use the services of an abattoir simply because of its geographic proximity to the producer. There are many other important considerations including animal-welfare, service and quality of work, which may influence a producer to wish to slaughter their animals on site. Furthermore, the requirement to “attach a letter from regional or municipal authority confirming no bylaws or restrictions would prevent slaughter on the farm/property” can stop an application in its tracks due entirely to bureaucratic inefficiency. Often, municipal government workers do not have any knowledge of the relevant bylaws or may not be forthcoming with the required documentation even if they are. It should be enough that the producer has checked and confirmed that there are no relevant bylaws. Furthermore, there is the question whether some municipal bylaws contravene a farm’s right to process their own animals which is protected under BC’s Farm Practices Protection Act which defines a farm operation as:

any of the following activities involved in carrying on a farm business:

- (k) processing or direct marketing by a farmer of one or both of
 - (i) the products of a farm owned or operated by the farmer, and
 - (ii) within limits prescribed by the minister, products not of that farm, to the extent that the processing or marketing of those products is conducted on the farmer’s farm;

The “time-limited” condition on Class E licenses is also problematic and may result in a producer losing their license simply because a new facility has opened within two hours of their location. This is punitive and unfair as most producers would be required to invest considerable time/resources in order to be able to slaughter their own animals and it isn’t reasonable that once given, this license should not be renewed for this reason.

The “seasonal slaughter” condition is problematic for similar reasons. It takes the same amount of capital to get set up to slaughter safely once a year as it does to slaughter safely year round. It’s either safe or it isn’t. It doesn’t suddenly become unsafe for part of the year just because the local abattoir has capacity at a given time.

TRAINING

The current Slaughter Safe training is sufficient but could benefit greatly from putting the whole course online where multimedia resources could be used for educational purposes and address timing and geographical constraints. It could also dramatically reduce the cost of implementation.

Additional online databases of common parasites, their presentations and actions required, with links to more information, for example, would be very beneficial. Videos, animations, even interactive content could enrich the course and offer information that is difficult to present in the current format. It would also make the course more accessible to a larger number of people, especially those in more remote areas. An online platform would also act as an ongoing resource for licensees which would be valuable, particularly for those who may slaughter only infrequently and benefit from a refresher.

One area of concern is the lack of education and oversight with regards to the actual slaughter process. An online platform would better allow for the demonstration of proper slaughter techniques but demonstration of good technique should be a requirement before issuing a license. This could be accomplished by having an inspector on site at the licensee's first kill, or perhaps by having the licensee participate in a kill at another licensed facility with sign off from another licensee or even someone from our Association.

CONNECTIONS

An online platform would also be a way to connect licensees all across the province which would be the start of a valuable support network. Our Association would be happy to take on a leadership role in establishing, administering and maintaining this network if funding were provided. We can bridge the divide between governance and administration and the licensees, disseminate information, offer support, information and resources as well as collecting useful data that may be useful to the Ministry.

FUNDING

Adjustments to the current Class D and E license systems could help to relieve some of the issues we currently face with regards to capacity at A and B facilities and contribute to food security in BC. There is precedent for significant funding being provided to A & B facilities to help cover setup costs in the past. Directing some funding towards programs, training, and even helping to offset some of the setup and ongoing costs, particularly for Class D licensees seems appropriate.”

SSMPA Members:

“1) lack of Abattoirs

2) Difficulty with getting spots in said abattoirs, specifically during fall when all the beef producers are flooding in

3) Distance and hence expense of taking animals to abattoirs.

4) Stress on the animal. We go to considerable time and expense to pasture raise our Berkshire

pork and have to submit the animal to considerable stress to move it off the farm on the abattoirs scheduling.

5) Local food is the epitome of food security

6) The abattoirs that we are allowed to take our pork to are in direct competition with us for market share. They make their money both ways: Slaughter and processing fees and selling finished product from Pork they import from Alberta CAFO operations. It isn't fair, and it isn't local and most consumers are not aware of the practice. If we were allowed to process our own I would capture another 30% of my pork producing costs. We don't necessarily like how they process some pork products but essentially have no choice in where we can take our animals. We have several customers who will refuse products made in the facilities.”

“My first comment is that the time allotted to answer this survey was not sufficient. We are all busy farmers and you really should have left us a month to answer thoughtfully.

Farmer's livelihoods and the disappearance of an ancestral craft are very important. It is not all. Animal welfare. Our pigs are born on the farm. We go to great extent to provide them with the best life possible. Bringing them to the abattoir 2 hrs of trailer ride away then leaving them to spend a night on cold concrete floor surrounded by stressed and screaming animals is perhaps the worst way to end the life of an animal that you love and have created a relationship of respect and care with.

We've slaughtered many animals on the farm to feed our immediate family. The process is clean, wholesome, respectful. There really is no reason to forbid this.

Even if it means that we have to put a precautionary label on our meat to warn consumers that it was not processed in a government approved facility, it would still be worth opening up.”

“Let any farmer that can demonstrate they have good animal welfare practices and know how to do a sanitary humane slaughter have a class D or E on their property.

Stop making it so hard for medium scale farmers trying to produce a high end product to slaughter and butcher their own animals.

Inspect and regulate class D and E's or come up with a new license for those of us that just want to do our own animals on our own farms but can't afford to sink \$250,000 into building a plant up to the standards of a class A”

“An online platform would also be a way to connect licensees all across the province which would be the start of a valuable support network. Adjustments to the current Class D and E license systems could help to relieve some of the issues we currently face with regards to capacity at A and B facilities and contribute to food security in BC. There is precedent for significant funding being provided to A & B facilities to help cover setup costs in the past. Directing some funding towards programs, training, and

even helping to offset some of the setup and ongoing costs, particularly for Class D licensees seems appropriate”

“The process of raising and selling meat feels overregulated. If a producer proves they have a clean process it's odd that each animal, under class A and B, need to be inspected. At any point meat can be contaminated, in a store, in transit, a restaurant, in the owners own home. Stores and restaurants have inspections periodically done to prove they are safe. Small farms should have the same level of oversight and be able to sell to their communities. I'm glad this is being considered as when we purchased this farm I was excited at the prospect of doing just that. Then once I read what the requirements were I was in shock that anyone has ever done it at this scale (has anyone?). Small scale farmers don't have the financial pipeline to accommodate such high requirements. As a consumer it is my preference to obtain products from small farms. There is a level of care and craft that only exist there. The ability produce meat with those values would be beneficial to the health of small farms and the communities that surround them.”

“I feel the program is great to have but can use some serious improvement. I feel there should be more training offered to both farmers and Health Inspectors.”

“We strongly believe that food needs to become more locally available, while upholding premium qualities (grass-fed, no hormone, no chemicals, no antibiotics). Meat animals should be humanely raised, and processed, and fed products that ensure the highest human health qualities possible. Current regulation is prohibitive to establishing a farm business that is profitable. There are also limited options available in our geography for "Grass-Fed" certification in processing. Local abattoir options are extremely restrictive in scheduling, locations and costs.

In terms of food safety, there needs to be some onus on the consumer. If there was a certification of "on farm processed" or the like, consumers would be able to understand the processing process that each farmer takes when they purchase the product from the farmer. Also, in terms of food safety, there have been numerous recalls of consumer products, Costco comes to mind. Products properly processed on-farm are just as safe or safer than consumer products.

We also believe that the current system of cattle auctions, transporting the animals to feedlots, and the finishing in feedlots, is wrong on so many levels. This system is highly petroleum fuel dependant (high carbon footprint), the feedlots are horrendous conditions for the animals, and we believe this is contributing to the public's poor health. Allowing more farmers to market products direct to consumers, and retail environments is better for communities, public health, and over-all living conditions of the farm animals”