

**MODERNIZING RURAL MEAT PRODUCTION IN B.C.**

**ONLINE SURVEY**

# What We Heard

---

**MARCH 2021**



## TABLE OF CONTENTS

*"I want to make my voice heard for a robust system of slaughter licensing in B.C. that matches oversight to risk, minimizes excessive costs for small operators, and enables the type of business development in all areas of the province that we have demonstrated is possible here at our farm..."*



MODERNIZING RURAL MEAT PRODUCTION IN B.C.  
ONLINE SURVEY | WHAT WE HEARD | MARCH 2021

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1	<b>INTENTIONS PAPER AND ENGAGEMENT PROCESS</b>
1	<b>SUBMISSIONS</b>
2	<b>SUPPORT FOR MODERNIZATION</b>
2	<i>Overarching Themes</i>
2	<i>Rural Slaughter is Not Descriptive</i>
3	<i>Public Health and Safety</i>
3	<i>Innovation</i>
3	<i>Regulatory Efficiency</i>
3	<i>Strengthening our Provincial Food Supply</i>
4	<b>ADDITIONAL THEMES</b>
4	<i>Provincial Capacity Issues</i>
4	<i>On-Farm Slaughter Improves Animal Welfare</i>
4	<i>Industry Consultation</i>
4	<i>Risk-Based Inspections vs Full Inspections</i>
4	<i>Small Farms Provide Better Traceability</i>
5	<b>FEEDBACK FROM PRODUCERS</b>
5	<i>Key Themes</i>
6	<b>FEEDBACK FROM THE PUBLIC</b>
6	<i>Key Themes</i>
7	<b>FEEDBACK FROM NGOS AND INDUSTRY ASSOCIATIONS</b>
7	<i>Key Themes</i>
8	<b>FEEDBACK FROM CLASS A AND B LICENCE HOLDERS</b>
8	<i>Key Themes</i>
9	<b>FEEDBACK FROM CLASS D AND E LICENCE HOLDERS</b>
10	<i>Key Themes</i>
11	<b>FEEDBACK FROM LOCAL AND REGIONAL GOVERNMENTS</b>
11	<i>Key Themes</i>
12	<b>APPENDIX A</b>

## INTENTIONS PAPER AND ENGAGEMENT PROCESS

*On September 14, 2020, the Ministry of Agriculture (Ministry) released an Intentions Paper on Rural Slaughter Modernization, outlining the Ministry's proposed options for modernizing meat production in B.C.*

The Ministry's goal is to create opportunities to realize efficiencies, minimize risks, ensure opportunity, and simplify practices for producers and processors while maintaining consumer confidence in a safe, stable supply of B.C. meat that is produced humanely.

During the engagement period, which ran until November 16, 2020, the Ministry collected 88 submissions from meat producers, meat facility operators, industry associations and non-government organizations, local governments and the public. 86 were received by email, and 2 were received by surface mail.

There are currently 149 licenced slaughter establishments in B.C., and as of 2016 there were more than 15,000 farms producing livestock and poultry. Given the size of the sector the response rate was low, however, the information received is valuable for gauging interest in the various topics presented. COVID-19 has highlighted the essential need for B.C. to have a stable food supply for our residents.

On December 1, 2020, the transfer of administration of Class D and E licences from health authorities to the Ministry was completed. The Ministry is updating the rural Code of Practice and developing a new 'SlaughterRight' training program for facility operators, and is planning on increasing oversight by inspecting every Class D and E facility by December 1, 2021. These updates contribute to the objectives of the Regulatory Efficiency theme presented within the Intentions Paper. The feedback received will be considered in development of an action plan for modernizing meat production.

## SUBMISSIONS

*Submissions were divided into six stakeholder groups. The number of submissions for each group is categorised in the table below.*



Stakeholder Group	Submission #
Producers	33
Public	22
Non-Government Organizations (NGOs) and Industry Associations	12
Class A/B Licence Holders	10
Class D/E Licence Holders	5
Local/Regional Government	4

Each response was reviewed and assessed as to whether it agreed, disagreed, or was neutral regarding the multiple themes conveyed within the Intentions Paper. During review, it became apparent that there were additional themes contained in the feedback that had not been presented in the Intentions Paper, as a result, new categories were added to track these. The overall results were then broken down by stakeholder group.

Support for the main and additional themes is explored in the next section and is followed by a break-down of the key themes for each submission group. A graph containing support levels for all intentions paper themes and additional themes is contained in Appendix A.



## SUPPORT FOR MODERNIZATION

*“This year we have seen a huge increase in demand for our farm products in our local market. Unfortunately, we are unable to expand our business because of lack of access to processing facilities.”*



The reporting within this What We Heard document outlines the level of agreement and disagreement contained within the submissions received. It has been categorised into the main Intentions Paper themes and additional themes. Many submissions did not comment on the majority of themes, for which they were assessed as neutral. Stakeholders and those working in the sector provided the most detailed comments regarding the intentions and presented numerous options on how the Ministry might proceed.

### OVERARCHING THEMES

- » Strong support for modernization, and many of those who responded favourably also urged the Ministry to act quickly to deal with outstanding issues the meat sector is facing. 80% of the feedback received agreed with modernization, while 3% disagreed.
- » The meat sector in B.C. is facing capacity issues relating to a lack of skilled labour, and a lack of processing options such as cut and wrap facilities and butchers. These issues are affecting the entire sector and consumers.
- » Large portions of the Intentions Paper were disregarded by many respondents and were coded as neutral. Given this high level of neutrality and the low level of disagreement regarding the proposed options, it appears that these topics were not controversial or highly divisive.
- » Responses from small-scale meat producers and local governments favour the Ministry making Class D and E licences available in more areas of the province and increasing where and how that meat can be sold.
- » Public support for small-scale meat producers in B.C. is strong, and consumers have a strong desire to support local farmers and producers.

### "RURAL SLAUGHTER" IS NOT DESCRIPTIVE

Some submissions commented that referring to this project as "rural slaughter modernization" is not accurate. Using the word "rural" to describe Class D and E establishments is unclear because some of those establishments are not in "rural" areas of the province, and most Class A and B establishments are in "rural" areas. We have adjusted materials in response to this feedback.

## **PUBLIC HEALTH AND SAFETY**

### **▶ UPDATED RISK ASSESSMENT**

11% of feedback agreed that the Ministry should undertake a new risk assessment project to support development options for meat production.

1% disagreed and 88% were neutral.

### **▶ UPDATED TRAINING**

30% agreed that the Ministry should develop updated training materials regarding slaughter practice, animal welfare, and food safety for rural producers.

1% disagreed and 69% were neutral.

### **▶ UPDATED RURAL CODE OF PRACTICE**

16% agreed that an updated rural code of practice would establish higher standards and provide improved clarity about requirements for licence holders and operators. 0% disagreed and 84% were neutral.

### **▶ INCREASED OVERSIGHT OF PLANS AND RECORDS**

22% agreed that more comprehensive, frequent, and consistent oversight of Class D and E licence holders' food safety plans, standard operating procedures and record-keeping by the Ministry would contribute to improved public health outcomes. 9% disagreed and 69% were neutral.

### **▶ INCREASED FREQUENCY OF RURAL INSPECTIONS**

19% agreed with the Ministry's commitment to increasing inspection of rural meat facilities, as well as public reporting on inspections and compliance. 0% disagreed and 81% were neutral.

### **▶ EDUCATION BEFORE ENFORCEMENT**

6% agreed that the Ministry should make every effort to work with operators on improving facilities and practices as a first step towards ensuring compliance. 0% disagreed and 94% were neutral.

## **INNOVATION**

### **▶ ALTERNATIVES TO TRADITIONAL INSPECTION**

40% agreed that the Ministry should be seeking opportunities to explore alternatives to traditional inspection like remote inspection, or other uses of agri-technology. These alternatives may include remote ante-mortem inspection, "cold" post-mortem inspection, or third-party inspection. 0% disagreed and 60% were neutral.

16% agreed that alternative models of licencing mobile abattoirs should be explored. 1% disagreed and 83% were neutral.

### **▶ REGULATORY CHANGES**

In general, feedback was supportive of the Ministry exploring the following changes to the current licensing framework for Class D and Es:

» 19% agreed with increasing the allowable volume of production. 3% disagreed and 78% were neutral.

» 30% agreed with increasing available markets where meat can be sold, as well as increasing the geographic scope of where they can sell. 1% disagreed and 69% were neutral.

» 41% agreed that Class D and E licences should be available in more areas of the province. 2% disagreed and 57% were neutral.

» 2% agreed that the Ministry should consider re-defining the existing licence names to make more sense for users and the public. 0% disagreed and 98% were neutral.

## **REGULATORY EFFICIENCY**

### **▶ REALIZING EFFICIENCIES**

7% agreed that the Ministry taking over administration of all facilities from health authorities will improve efficiency, reduce stakeholder confusion, and improve oversight. 0% disagreed and 93% were neutral.

### **▶ COLLABORATION**

3% agreed that the Ministry will need ongoing collaboration with health authorities on food safety matters relating to food premises. 0% disagreed and 97% were neutral.

## **STRENGTHENING OUR PROVINCIAL FOOD SUPPLY**

52% agreed that access to local meat should be increased, and that developing a resilient and diverse food supply chain can help to mitigate large scale production disruption and strengthen local food supply security. 1% disagreed and 47% were neutral.

## ADDITIONAL THEMES

*“Abattoirs are an absolutely essential feature of a vibrant and resilient small-scale meat system, and right now the lack of reliable access to abattoirs is the main roadblock facing existing producers.”*



### PROVINCIAL CAPACITY ISSUES

77% of feedback suggested that there are capacity issues negatively affecting B.C.'s meat production sector. 0% disagreed and 23% were neutral. These issues relate to a lack of skilled labour and cut and wrap services, and are affecting abattoir operators as well as producers who are facing long wait times for booking slaughter services. Closures of existing Class A and B facilities are also forcing producers to seek slaughter services farther from their farms, requiring more travel.

18% suggested that the Ministry should provide funding to industry and producers to help them upgrade their equipment and infrastructure to help alleviate capacity issues. 0% disagreed and 82% were neutral.

### ON-FARM MEAT PRODUCTION IMPROVES ANIMAL WELFARE

23% of respondents suggested that on-farm production improves animal welfare. Those who agreed commented that they would rather be able to produce or consume meat from animals that are raised and slaughtered on the same farm. Feedback that favoured this theme suggested that longer travel times increase animal stress, and reducing that stress is important both from an animal welfare and a meat quality standpoint. 1% disagreed and 76% were neutral.

### INDUSTRY CONSULTATION

11% suggested that the Ministry should continue to consult with producers and industry stakeholders as they develop policy options or update existing requirements such as rural Codes of Practice or Standard Operating Procedures. 0% disagreed and 89% were neutral.

### RISK-BASED INSPECTIONS VS FULL INSPECTIONS

14% suggested that the Ministry should explore risk-based inspection models as a method to free up ministry resources that would otherwise be going towards increased oversight, and to reward good compliance. 0% disagreed and 86% were neutral. Contrary to the above theme, 8% suggested that Class D and Es should be inspected by meat inspectors, to ensure operators are adhering to food safety and regulatory requirements. 2% disagreed and 90% were neutral.

### SMALL FARMS PROVIDE BETTER TRACEABILITY

11% suggested that when compared to larger establishments, smaller farms selling directly to consumers provide a better avenue for traceability should a public health event occur. 1% disagreed and 88% were neutral. Comments suggested that these producers know their customers individually and pride themselves on selling high quality meat. They feel their reputation relies on selling a high-quality product, so they take precautions to ensure the meat they sell is free from contamination of any kind.



## FEEDBACK FROM PRODUCERS

*“As a small farmer, I would like to be able to feed my neighbourhood and my community. The market exists to expand the small, sustainable livestock that I already produce for my family into a larger locally-grown meat production.”*



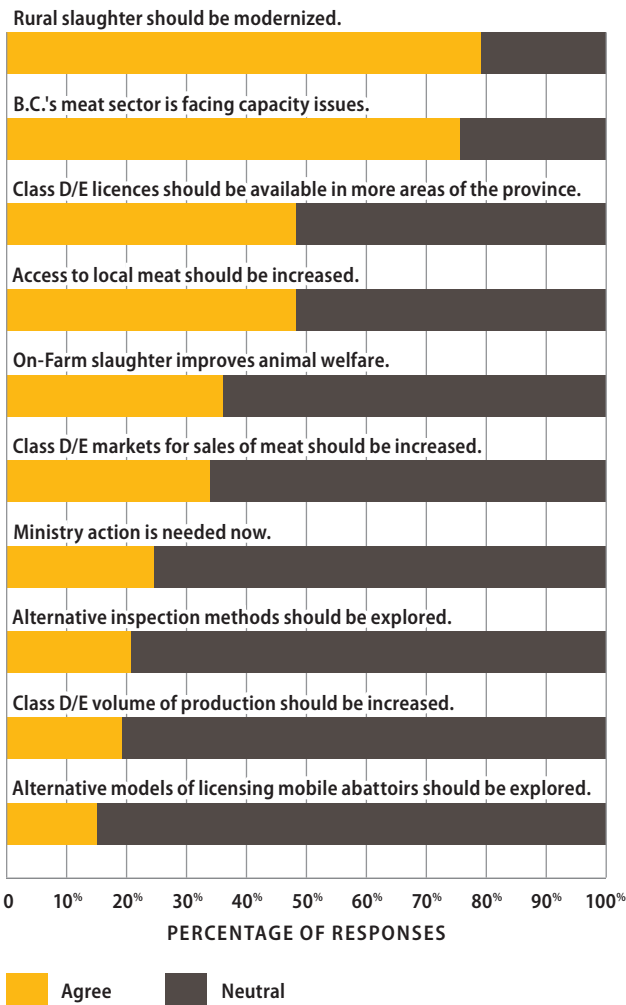
The Ministry received 33 submissions from producers throughout BC, and from many who identified themselves as small-scale producers.

### KEY THEMES

- » Rural meat production needs to be modernized. In many cases, producers felt that the Ministry’s current licensing framework does not allow them to operate viable businesses in the way they would like. They take pride in supplying meat to their communities and believe that access to local meat should be increased.
- » Many provided feedback on the issues they face with securing processing for their livestock, whether it is slaughter or cut and wrap services. Beyond not being able to book slaughter dates, issues involve having to travel many hours in one direction to drop their animals off at Class A or B establishments, only to have to make the same trip to pick them up again, or not being able to secure bookings for their small poultry batches due to local facilities only taking large batches.
- » Almost half agreed that Class D and E licences should be made available in more areas of the province, and a smaller number agreed that meat from Class D and Es should be able to be sold beyond their regional district, or that Class E’s should be able to sell to retail.
- » Many producers described their respect for the livestock they raise and the care they provide, and how they want to provide that same care and respect through the full production process.

► **PRODUCER MAIN THEMES**

(33 Submissions)



Note: Submissions from producers did not disagree with any of these key themes.

**FEEDBACK FROM THE PUBLIC**

*"I care deeply about our local B.C. economy and the livelihoods of BC residents, having a healthy and thriving local food system, having high-quality and affordable food available to B.C. residents, and the humane treatment of the animals within our food system."*



The Ministry received 22 submissions from the public and consumers. Submissions that did not clearly belong to a particular category were included with this group.

Consumers and customers of small-scale farmers felt it was very important that they were able to buy meat from producers they know, and trust are raising animals humanely.

**KEY THEMES**

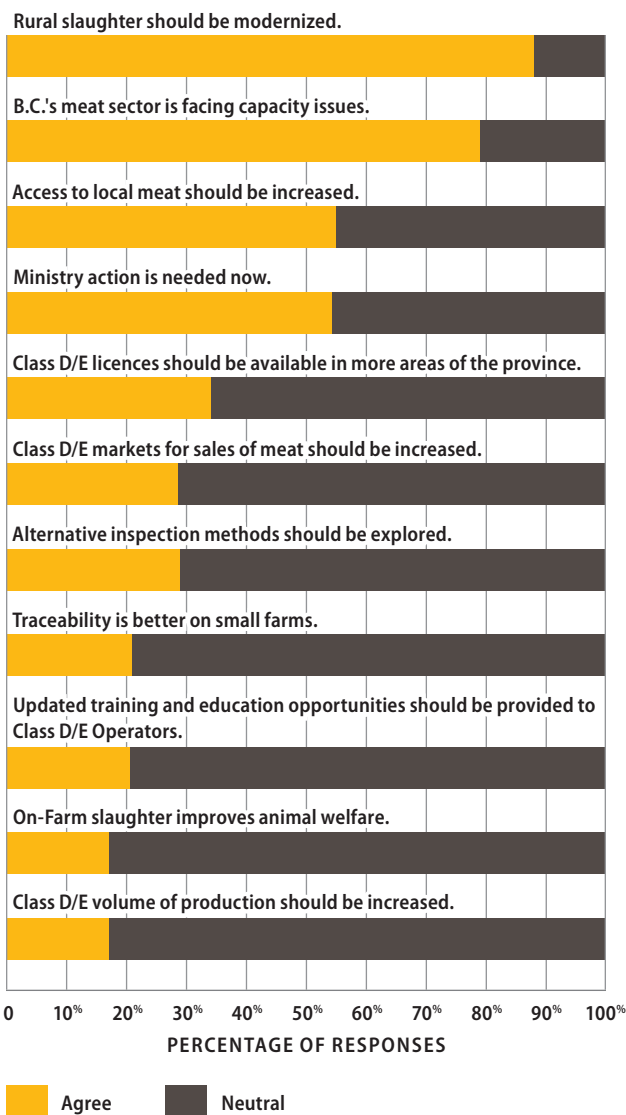
- » Most submissions were in favour of modernization in general, without commenting on specific themes.



- » The majority were also concerned with capacity issues facing the meat sector.
- » More than half of responses want access to local meat increased, and they believe that action is needed now.
- » There was some support for updating the Class D and E licensing framework, such as making them more available throughout the province, as well as increasing the markets where meat from these types of licences can be sold.

**► PUBLIC MAIN THEMES**

(22 Submissions)



Note: Submissions from the public did not disagree with any of these key themes.

**FEEDBACK FROM NGOS AND INDUSTRY ASSOCIATIONS**

*“We need to address the mounting meat-processing crisis and ensure positive and immediate actions are not thwarted. A thriving and resilient meat processing industry will serve the economic, nutritional, social, community development, food production and climate change goals of all British Columbians.”*



The Ministry received 12 submissions from industry associations and non-governmental organizations, representing different areas of the meat sector, from animal associations, to a larger submission with 14 stakeholder signatories which was treated as one submission. This group of submitters was very engaged with the Intentions Paper themes and provided very detailed feedback.

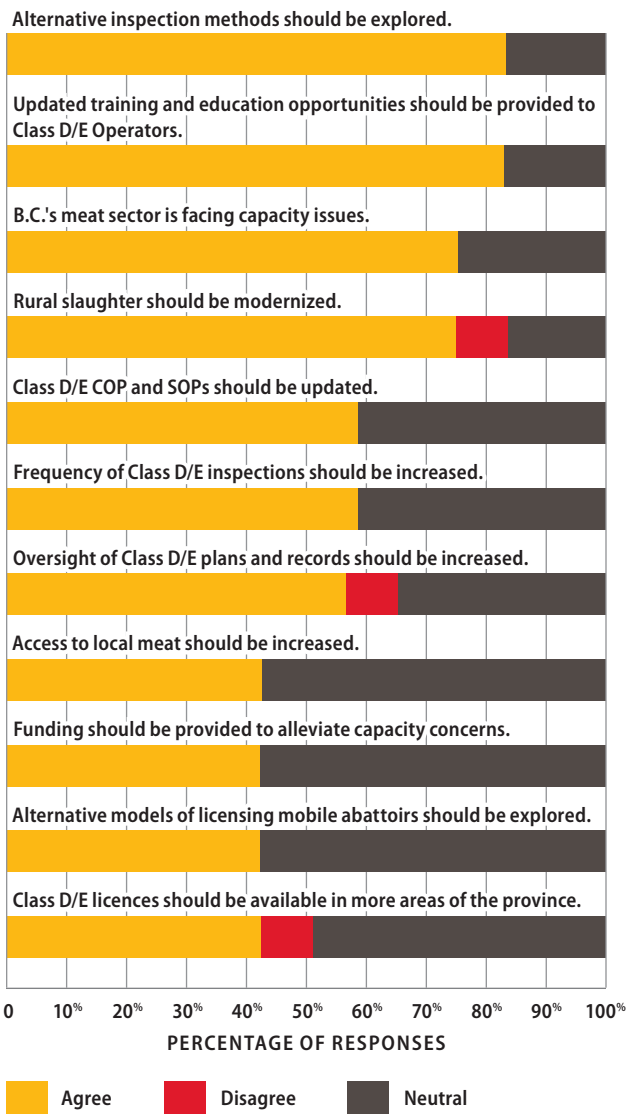
**KEY THEMES**

- » The Ministry should explore alternative inspection methods, such as utilizing virtual technologies, or moving towards risk-based inspection schedules.

- » Producers and facility operators should be provided with updated education resources, and should be working with schools such as Thompson River University to align their curriculum with the meat inspection program.
- » Oversight and inspections of Class D and E establishments should be increased.
- » Feedback from members underscored the capacity issues the province is facing, and most highlighted this issue, as well as the need to modernize meat production

► **NGOS AND INDUSTRY ASSOCIATION  
MAIN THEMES**

(12 Submissions)



**FEEDBACK FROM CLASS A AND B LICENCE HOLDERS**

*“As our abattoir makes it’s way through an especially busy fall season unlike any other year, we realize that the demand for high quality local meats has increased exponentially. We also know that many other abattoirs in B.C. are also feeling the pinch and pressure of increased, steady demand while dealing with critical labour shortages in an already tough industry.”*



The Ministry received 10 submissions from Class A and B establishment operators. Overall, this group provided comments for many of the themes, as well as commenting on how many of the ideas could also be applied to Class A and B establishments.

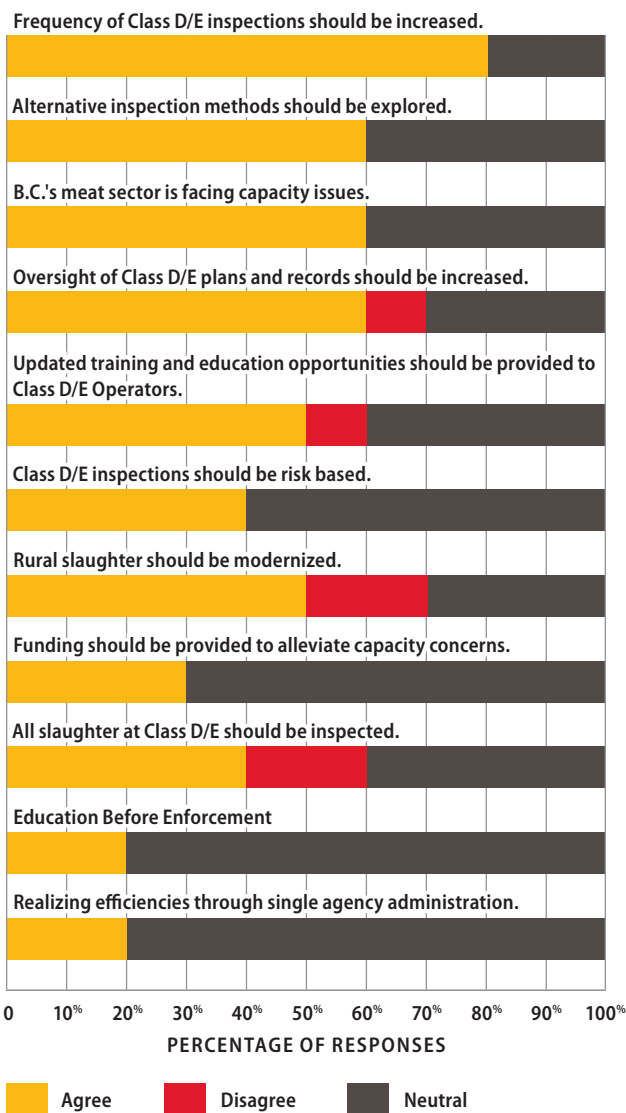
**KEY THEMES**

- » Feedback suggests the capacity issues facing the meat sector stem from both a lack of cut and wrap and butchering services, and a difficulty in finding skilled abattoir employees. In addition to these issues, scheduling backlogs are created when many producers prefer to slaughter in the busy fall months, rather than utilizing the shoulder seasons and booking accordingly.

- » There were strong feelings that without full-time inspection, Class D and E establishments posed a risk to the meat sector. A food-borne illness event from uninspected meat could damage the image of the whole provincial sector. To mitigate this risk, this group is strongly in favour of increased inspections for Class D and E.
- » Alternative inspection methods should be explored, such as risk-based systems allowing remote inspection in low-risk establishments (for Class D, E, A, or B), as well as utilizing a system like the federal Modernized Poultry Inspection Program in high volume poultry plants.
- » There is support for increasing oversight and training of Class D and E operators.

► **CLASS A AND B MAIN THEMES**

(10 Submissions)



**FEEDBACK FROM CLASS D AND E LICENCE HOLDERS**

*“B.C. farmers need as many abattoir opportunities as possible, in every community, regardless of proximity to licensed Class A or B facilities.”*





The Ministry received 5 submissions from Class D and E licence holders or operators throughout B.C. While this number was smaller than anticipated, their responses echo what was heard during the *2018 Class D and E Licence Consultation*<sup>1</sup> which heard from 65 Class D and E applicants, including 21 current licence holders, 31 expired licence holders, and 13 whose applications did not proceed.

Overall every response in this group was supportive of modernization, as well as increasing access to local meat.

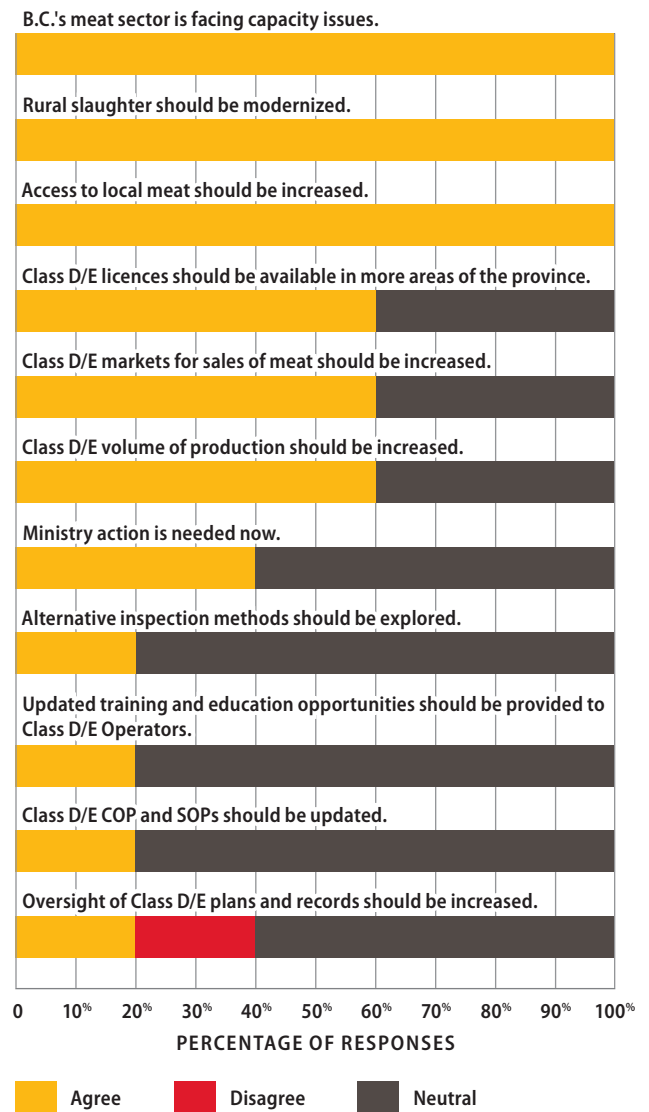
### KEY THEMES

- » All submissions referenced issues with using existing Class A and B facilities, such as waitlists of a year or longer to book slaughter services or needing ferry travel which adds cost and travel time. They also highlighted the lack of cut and wrap facilities.
- » Some Class E holders find the current geographic, volume, and sales limits restrictive, and are in favour of increasing all these limits.
- » Some found the 10,000 lb volume limit for Class E too restrictive to support a viable farm business that meets the needs of customers.
- » Class E holders also found that the restriction against selling to retail impacted their business plans, while others suggested that both Class D and E licence holders should be able to process poultry into parts for easier sales, arguing that the further butchering would not increase the food safety risk.
- » There was minimal support for exploring alternative inspection methods (20%), updating training and education for Class D and E operators (20%), and updating the Rural Slaughter Code of Practice (20%).

<sup>1</sup> <https://tinyurl.com/2qtjt7tm>

### ► CLASS D AND E MAIN THEMES

(5 Submissions)



## FEEDBACK FROM LOCAL AND REGIONAL GOVERNMENTS

*"...it is very important to acknowledge the linkage between farmers and urban communities. The proposed changes to the meat regulations are not just a rural matter. For example, farm gate sales provide an opportunity for the broader community to establish relationships with farmers and know where their food is coming from."*



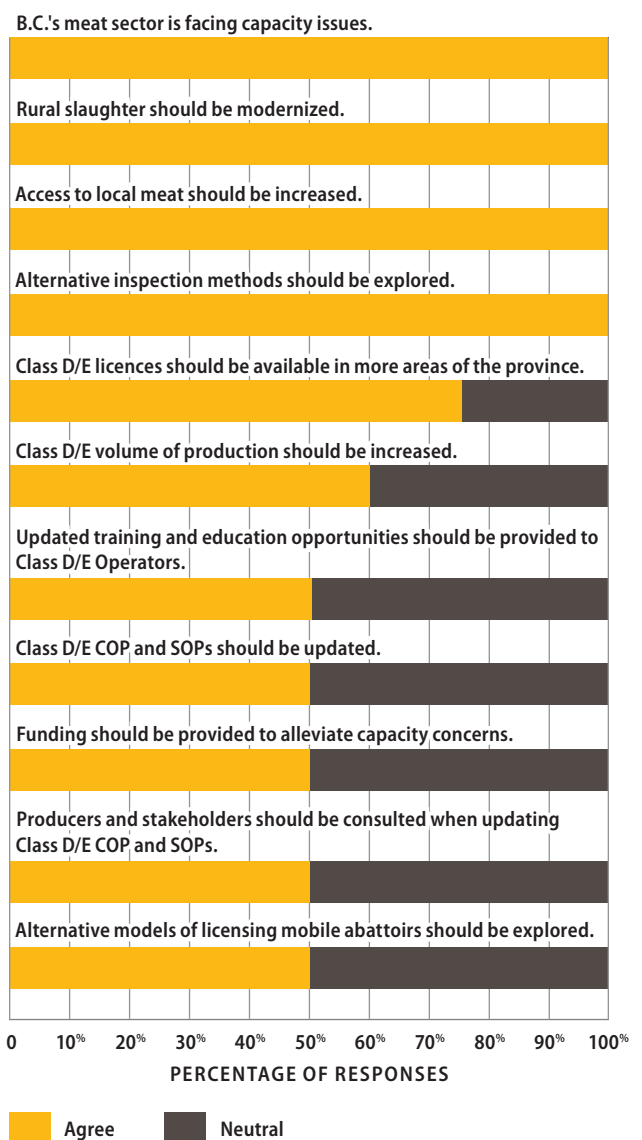
The Ministry received 4 submissions from either municipalities or regional governments, including regional agricultural councils or groups that were able to speak for their community. This number was lower than anticipated, but feedback was consistent with what has heard from the Class D and E consultation, and the 2019 Discussion Paper to solicit feedback from Local Governments about Class D Licences.

### KEY THEMES

- » All submissions highlighted the capacity issues that producers and establishment operators are facing.

- » All submissions were in favour of modernization and providing more access to local meat. Stronger local food hubs would also strengthen the economy. Producers would spend more resources within the community to supply their farms.
- » They are highly in favour of the Ministry exploring alternative inspection methods such as using virtual technologies.
- » Many are in favour of making Class D and E licences more available either within their region, or B.C.

### ▶ LOCAL/REGIONAL GOVERNMENT MAIN THEMES (4 Submissions)



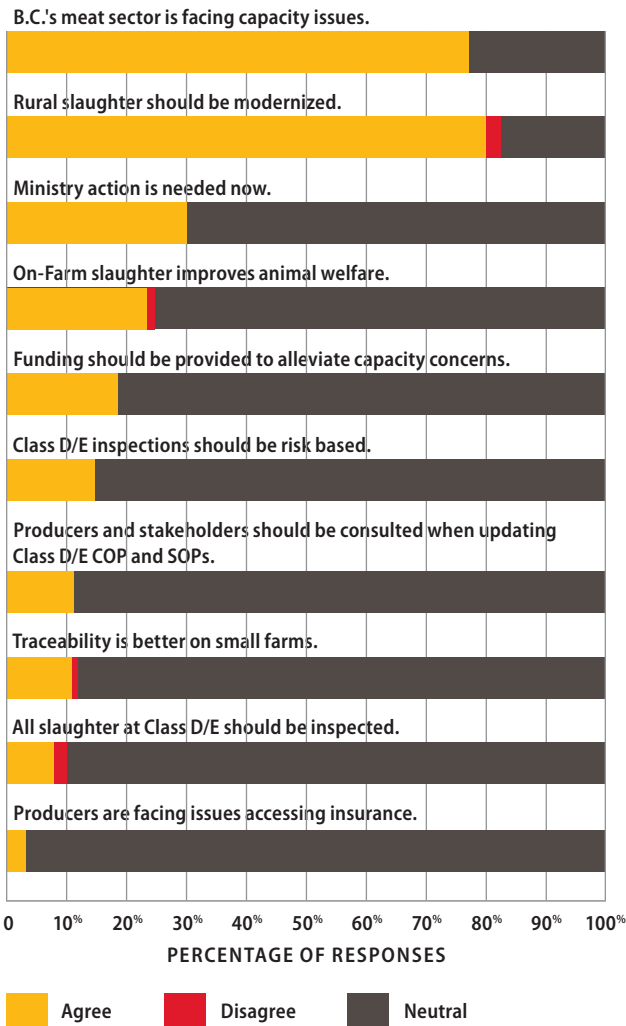
*Note: Submissions from local and regional governments did not disagree with any of these key themes.*

# APPENDIX A

## Coded Support for Rural Slaughter Modernization Intentions Paper Themes

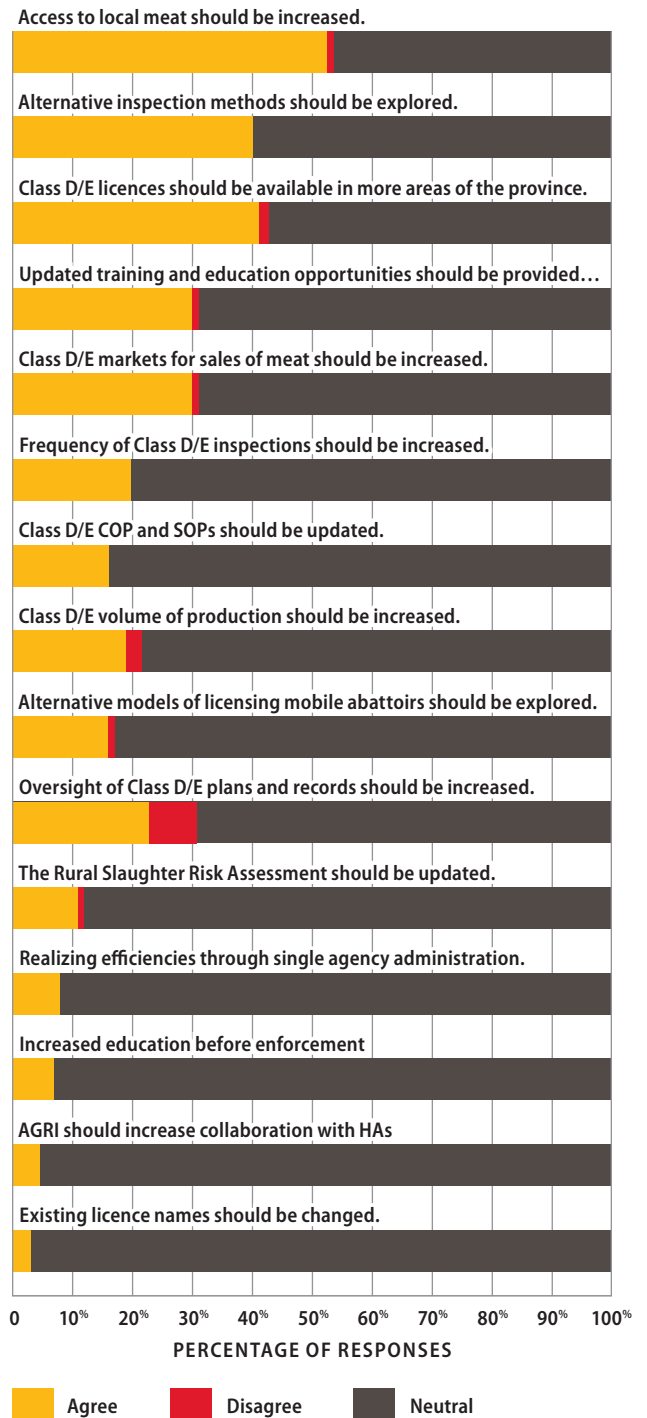
### ► SUPPORT FOR RURAL SLAUGHTER MODERNIZATION INTENTIONS: A

(All Submissions)



### ► SUPPORT FOR RURAL SLAUGHTER MODERNIZATION INTENTIONS: B

(All Submissions)







Ministry of  
Agriculture, Food  
and Fisheries