

## **BC's Meat Inspection Regulation: CRITIQUE AND RECOMMENDATIONS**

### **Meat production: a systems view**

Most Canadians enjoy food that costs them less from their disposable income than anywhere else in the world. Yet this system for the production of "cheap" food has hidden costs.

The recent discoveries of BSE (Bovine Spongiform Encephalopathy, or Mad Cow Disease) and avian flu in the Canadian food system have caused much reassessment of how meat is produced and processed.

But have we taken a hard enough look at the design of the system itself?

A food system such as ours, designed to maximize production and minimize consumer price, features large numbers of very few animal species concentrated in one region, in confined spaces, and fed artificially enhanced diets – conditions that are conducive to the rapid spread of diseases like avian flu. When avian flu struck, the costs that came due included interruption of almost all of BC's poultry and egg production and the killing and disposal of millions of birds - with far-reaching negative economic and environmental effects.

We argue that to more effectively minimize food-borne disease in meat production and processing, we need small- and medium-scale operations in many regions as well as large-scale operations in one region. Decentralization and diversity will make meat animals, farm and food businesses, and local economies stronger. Further centralization and control, the approach implied by the Meat Inspection Regulation, will actually reduce farm and food safety.

### **The Meat Inspection Regulation**

We agree with BC's Ministers of Health and Agriculture that the BSE discovery in Alberta and the avian flu crisis in BC have highlighted the importance of protecting the safety of our meat supply, and that we need uniform meat inspection requirements across BC.

Unfortunately, the Meat Inspection Regulation fails to adequately address the BSE issue and unnecessarily threatens vital local agricultural

economies and jobs. It could result in loss of tremendous potential growth for BC's tourism, hospitality, and restaurant businesses.

Local economies will suffer because meeting the requirements of the Regulation will be far too costly for a very large proportion of BC's small- and medium-scale meat producers and processors. The Regulation is suitable only for large-scale centralized establishments. These are incapable of addressing the needs of local small- and medium-scale farmers, purveyors and restaurants.

The safety of meat begins with how animals are raised. Small- and medium-scale producers tend to grow their animals under less concentrated and therefore less stress- and disease-prone conditions than larger-scale producers. Thus their animals' feed requires fewer sub-therapeutic antibiotics and fewer high-protein supplements (which can include animal byproducts and lead, potentially, to BSE). Certified Organic operators, for example, are not allowed to use any synthetic chemical inputs and are required to provide humane and healthy conditions for their livestock.

The same scale issues apply at the slaughter and processing end of the chain. In large-scale centralized establishments, the volumes and associated speed of processing pose hazards to animals, workers, and the meat. These hazards do not apply in small-scale, hands-on operations. With local slaughtering, animals are not transported long distances, thus reducing their stress levels and enhancing meat quality.

Small- and medium-scale agricultural producers throughout BC play a large role in maintaining critical agricultural infrastructure, in providing local jobs in production and processing, and in supplying local restaurants, retailers, and consumers with a wide variety of high quality, safe, ethically produced food, for which there is ever-increasing consumer demand. Local small- and medium-scale meat establishments are integral to these local food systems.

## Policy recommendations

We recommend a Meat Inspection Regulation with the following characteristics to appropriately address all scales of meat slaughter and processing:

1. Proper slaughter and processing establishments:\* health and safety regulations **suitable for small- and medium-sized establishments**, including on-farm and mobile facilities
2. Trained and certified abattoir operators:
  - somebody certified in and responsible for food safety on site during all operating hours
  - local meat inspection training programs available – possibly through local colleges?
3. Trained and certified meat inspectors
4. Monitoring (quarterly? as well as unannounced) of meat by government-certified meat inspectors throughout slaughter and processing
5. Inspection of slaughter and processing establishments (quarterly? as well as unannounced)
6. Complete traceability and accountability for all slaughtered and processed meat
7. BSE protection:
  - elimination of all animal byproducts from ruminant animal feeds
  - provision of appropriate tissue samples and a BSE test for every ruminant animal slaughtered
8. Provincial audit of the meat inspection process: occasional review of the meat inspection process to ensure food safety and industry viability

\* *Note: "establishment" means any abattoir, slaughter house, packing house or other premises in which animals are slaughtered, or in which portions or products thereof are prepared for food, or are stored.*

Adoption of such recommendations and consultation with affected meat businesses can quickly lead to improved food safety, stronger agri-food infrastructure and healthier local economies. A more decentralized, fully traceable meat production and processing system is possible. Among other benefits, it would permit isolation of problem areas in future disease outbreaks. Instead of commodities being wiped out for the whole province, one region could come to the aid of another.

## Further policy recommendations: September 2004

The regulation was enacted in July 2004 with a two-year phase-in period. It will come fully into force September 1, 2006. We recommend the following:

1. That the above eight recommendations be discussed and considered for inclusion in the Regulation, based on the above arguments.
2. (Expansion of number 8 above) that government work with small- and medium-scale meat establishments to develop an audit or evaluation process for the Regulation during its phase-in period. This process would include:
  - a strategy for timely completion of assessments for a representative number of facilities, to determine actual impacts of the regulation around the province
  - inclusion in the assessment process of an independent third party observer/auditor recommended by the industry
  - compilation by this person of a public report on the findings from the assessments, and delivery of this report, with recommendations for change to the regulation as required, to the Legislature by August 2005
  - recommendation by the Ministers of Health and Agriculture for changes to the Regulation based on the findings and recommendations of the report by July 2006 (before the phase-in period expires)

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