

Thank you for an opportunity to respond to the Rural Slaughter Modernization Intentions Paper and the BC Government News Bulletin released on September 14, 2020, on supporting ranchers and abattoirs, "Ranchers and abattoir operators in British Columbia are contributing to improve rural food supply and food security in the province, as part of ongoing government efforts to increase livestock production and processing in rural communities."

As a small scale farmer with a Class D license, I welcome the following policy changes:

1. increasing the amount of meat that can be processed annually by Class D and E licence holders, and expanding the criteria of who and where their meat can be sold to;
2. developing alternative models of licensing mobile abattoirs to improve service for smaller-scale producers: and
3. exploring a pilot program for conducting certain inspection components virtually.

As a farmer who primarily raises livestock for meat, I applaud the BC Government's efforts to support rural and remote meat processing by increasing the Class D and E meat limits and expanding the sales criteria. **We need these policy changes enacted *quickly* if we are to support local small-scale farming and food security.**

BC farmers need as many abattoir opportunities as possible, in every community, regardless of proximity to licensed Class A or B facilities. Even in urban centres, within an hour drive of large abattoirs, the wait lists can be a year or more. The lack of access to rural slaughter and butcher facilities is burdensome as each day processing is postponed we lose profit on already small margins. By opening up both Class D and E licensing to the whole province and allowing more on-farm and mobile slaughter options, the government will reduce the strain on an already stressed and overburdened system.

Small-scale meat producers need access to designated small-scale meat slaughter and butcher facilities in every community. Most large scale facilities cater to large scale meat producers. Some poultry processing facilities have minimum orders of 300 meat birds which is simply not achievable for most small scale farmers who have a 99 bird limit. Small-scale farmers and ranchers make significant contributions to our local food supply and our local economies. And we need reliable access to appropriate slaughter and butcher facilities to support the growing consumer demand for locally raised meat.

Small-scale poultry producers need the ability to sell meat birds whole or in parts. On farm butchering and sales of poultry as a whole bird and in parts, should be permitted for all farmers without burdensome regulation. There is no reason why a farmer cannot be trusted to butcher a chicken or turkey, when they are already safe enough to kill and eviscerate. The most dangerous part of processing chicken is completed when it is a whole bird so continuing to butcher in parts adds no risk. If we are trusted to chill, package and freeze a whole bird, we can be trusted to do the same process to it's parts. Poultry butchery is an age old skill that is performed in households throughout our country daily.

Small-scale meat producers need the opportunity to sell processed and value-add meat products from their farms. Selling meat in it's processed form, such as jerky, bacon and sausages, offers value-add options critical to a farm's economic viability. It's time to respect the skill and professionalism of small-scale farmers and return their rights to raise, butcher and process food for our communities and to sell both frozen and cooked processed foods from their farm, including farm to table eateries. **MLA Ian Paton's Home-Based Craft Food Act 2.0 goes a long way to help farmers and food producers feed their community and remain economically viable without the unnecessary construction of a costly commercial kitchen.**

Recently, the Ministry of Agriculture quickly changed regulations for alcohol producers, allowing sales and deliveries direct to homes to provide relief for storage issues. But the Ministry of Agriculture has still not opened up enough processing opportunities for farmers facing similar stock piles of livestock, despite urges from Farmers Institutes in April 2020. You don't have to feed and water bottles of wine in storage.

The BC Government has been slow to act on September 2018 recommendations made by the Select Standing Committee on Agriculture, Fish and Food. Waiting for two years to act on this report and the slow response to open up Class D and E licensing since the COVID crisis began, feels as if small-scale food farmers are being ignored. Food farmers are asking for the same flexibility and quick resolutions as alcohol producers. If the government can remove regulatory burdens for alcohol producers in order to increase sales, meat producers should receive the same opportunity so we can improve local food security.

The following policy changes have the potential to be positive but are concerning if they are used to over-regulate and suppress small-scale meat producers:

1. updating licensee training on slaughter practice, animal welfare and food safety to ensure provincially consistent and effective learning opportunities for rural producers;

2. revising the code of practice for abattoir operators with required standard operating procedures to bring consistent practices and improved clarity for administrators and operators; and
3. increasing the frequency of government inspector visits to rural abattoirs to an annual basis to ensure awareness and compliance with all requirements.

While some of this increased regulation sounds like a good thing, I fear that the Ministry of Agriculture will use the current meat processing issues to over-regulate small-scale farms causing insurmountable burdens that only lead to closing down the very operators that actually enhance local food security.

In 2003, after BSE, the big meat packers who caused the BSE crisis to begin with by feeding ground up diseased meat to their cattle, used fear over food safety to create bigger monopolies, cutting out the small scale meat producer who played no part in spreading the disease.

Small scale meat producers prioritize food safety and animal welfare. We know each and every one of our animals, and take great care of our hard earned investments, our herd. We know each and every one of our customers, they are our friends, neighbors and family and we protect their food supply. **The reality is that small scale farmers and family farms are the least likely cause of disease outbreaks or an unsafe meat supply.** If you look at the list of [food recalls in Canada](#), most come from industrialized highly processed packaged foods, sauces and non-dairy milks.

As the [Small Scale Meat Producers Association](#) stated "The Union of BC Municipalities has passed numerous resolutions in support of expanding access to slaughter and processing for small-scale livestock operations since 2010, including 2018-B35 asking government to "give farmers the ability to slaughter their livestock on farm premises" and 2018-B75, which asks the government to "facilitate expansion of safe, local, slaughter and meat processing". The BC Chamber of Commerce took a position on this in 2015, recommending "that the Provincial Government expand D and E licenses throughout the province to include the 18 non-designated areas"."

[Alberta recently made approximately 60 amendments](#) to their meat inspection regulation giving consumers the choice to buy an animal directly from the farm and have it slaughtered on-site for their personal consumption, rather than having to purchase meat that is provincially or federally inspected. According to the [Young Agrarians](#), "Many new livestock farmers start out with small herds and flocks and grow from there. As they build their business, they often report that accessing abattoirs can be a challenge and this regulation offers more options in

making decisions about what will work best for their situation. Diversification is something that new farmers pursue in order to offer more products to their customers and grow their bottom line. This regulation supports getting into niche markets like ducks or geese, which no processors took previously."

COVID has exposed the reality that a centralized, consolidated industrialized food system leads to a fragile, insecure and unethical food supply. My hope is that we free up our food system to allow for more on farm processing, packaging and sales. Let's return our food system back to the fresh, localized, humane and ethical system it once was, where food was not the product of exploited ecosystems, animals and workers.

Thank you for your time and consideration.

Sincerely,
Raquel Kolof
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For your reference:

To build a resilient food system, we have to shine a light on the concentrated power of a handful of global firms—household names like Tyson, Bayer or Nestle, and less visible power players like the grain-trader Cargill (operating in 70 countries) or ChemChina (a giant in seeds and agrochemicals) or JBS (the largest meat packer in the world) (ETC Group 2019). In a for-profit system, the boards and management of these companies have more power to decide what, where and how food is produced, who is doing the work, and even who gets to eat it than do farmers, workers, eaters or communities. In this for-profit system, food is simultaneously made cheap through the exploitation of nature, farmers and workers while being too expensive for poor households around the world. Covid-19 exposes the faults of concentrated power in food systems in coping with other slower-moving ecological disasters like soil degradation, decline in water quality and quantity and weather calamities due to climate change (Hendrickson et al. 2019).

The way forward is to reprioritize the main goal of any food system—to provide healthy, nutritious food for all people, now and in the future, in the face of a changing climate and declining natural resources. To do that we must pursue worker rights, animal welfare, farmer viability and ecological sustainability simultaneously because they are all tied together. We gain flexibility and adaptability in a decentralized system of production and consumption, with power distributed from the bottom up. We need a diversity of public, private and

cooperative food and farm businesses, both small and large, that are transparently interconnected through multiple networks, to build redundancy and provide fallbacks when some organizations or networks fail.

No one approach at any given scale will prove effective. Instead we have to create a resilient food system through a combination of actions, strategies and policies at multiple levels that are ecological, democratic, and equitable within and across populations, generations and species.

Hendrickson, M.K. Covid lays bare the brittleness of a concentrated and consolidated food system. *Agric Hum Values* (2020). <https://doi.org/10.1007/s10460-020-10092-y>

As an agroecologist, I am keenly aware of the vulnerabilities resulting from modern industrial food and agriculture systems, including: large areas planted to single genetically similar crops, animals raised in crowded confinement, heavy use of chemicals, consolidation of food and farming systems under corporate control, loss of small- and medium-scale farms, horrible conditions and pay for work in the fields and factories, an increase in health problems related to poor diet, and policies that support large-scale operations. Agroecologists say that our modern food systems, from the farm to the consumer, are broken.

I never expected, however, we would confront these vulnerabilities all at once as is happening as a result of the COVID-19 crisis: panic buying, breakdown of supply chains, farm and food workers at greater risk, more hunger and malnutrition, and other problems due to the simultaneous breakdown of so many parts of the food system, from production to distribution to consumption.

Gliessman, S.R. Transforming food and agriculture systems with agroecology. *Agric Hum Values* (2020). <https://doi.org/10.1007/s10460-020-10058-0>

Resilience as defined by sustainability scientists is to maintain development in the face of both surprising and expected change, when thresholds between alternative pathways exist of which some may be less desirable than others, and where it is difficult or even impossible to turn back once the threshold is crossed (Folke 2006).

We are now in the midst of what is arguably the largest global crisis our generation has faced. My sincere hope is that the Covid-19 pandemic can help us recognize the invisible support systems we depend on to ensure that we nurture them as we continue our development into the future.

Gordon, L.J. The Covid-19 pandemic stress the need to build resilient production ecosystems. *Agric Hum Values* (2020). <https://doi.org/10.1007/s10460-020-10105-w>