

# SUMMARY OF INDUSTRY CONSULTATIONS ON THE B.C. ABATTOIR INSPECTION SYSTEM REVIEW

MINISTRY OF HEALTH AND MINISTRY OF AGRICULTURE

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## Background

This report summarizes the input received during consultations held by the British Columbia ministries of Agriculture and Health about developing a new meat inspection system for provincially licensed Class A and B slaughter facilities (abattoirs).

The inspection system currently operating in B.C.'s Class A and B abattoirs relies on the delivery of inspection services by the Canadian Food Inspection Agency (CFIA), guided by a memorandum of understanding with the Province established in the 1980s. The CFIA and the B.C. government recently agreed that the Province will assume responsibility for these meat inspection services by December 31, 2013. The inspection of federally licensed abattoirs and other issues of federal jurisdiction will remain the responsibility of the CFIA. The transition of meat inspection responsibilities gives the Province an opportunity to strengthen and evolve the meat inspection system in provincial abattoirs in a way that best responds to the needs of British Columbians.

The B.C. Ministries of Health and Agriculture initiated the B.C. Abattoir Inspection System Review (BCAISR) in 2010 to identify a meat inspection system that would best deliver on provincial objectives such as food safety, industry support, and animal health and welfare. The BCAISR was led by the Ministry of Health with participation from the Ministry of Agriculture, the BC Centre for Disease Control and the BC Food Processors Association.

The review included extensive consultation with B.C.'s livestock and slaughter industries and the participation of a number of meat inspection experts. The process concluded with the publication of the *Report on the B.C. Abattoir Inspection System Review* in February 2012, which outlines nine recommendations for a new provincial meat inspection system and two options for system design. When the report was released, the Ministries of Health and Agriculture announced further consultations with industry in order to gather implementation advice on the report findings.

## Consultation Format

Eight three-hour consultation sessions were held between February and April 2012, in Chilliwack, Nanaimo, Abbotsford, Dawson Creek, Vernon, Creston, Prince George and 100 Mile House. The sessions were led by the Ministry of Agriculture in partnership with the Ministry of Health. They were set up to gather implementation advice on the design of a provincially run meat inspection system and the work of provincial meat inspectors – including ante-mortem, post-mortem and facility inspections, as well as the oversight of slaughter practices and compliance with the B.C. Meat Inspection Regulation.

Members of British Columbia's livestock, slaughter, food processing and food retail industries were invited to participate in the consultations, as were representatives of animal welfare associations and public health professionals. Members of the public were also welcome to attend. In addition to the in-person consultation

sessions, the Ministry of Health solicited email submissions to [meat.inspection@gov.bc.ca](mailto:meat.inspection@gov.bc.ca) until April 30, 2012, to ensure that anyone unable to attend sessions could provide input.

Most participants who attended the sessions worked in the meat industry, for example as livestock producers or abattoir operators. Of notable difference, was the 100 Mile House consultation session, where over 80 community members attended, primarily to express support for the development of local slaughter capacity in their community. A number of email submissions were also received. Altogether, approximately 200 people attended one of the eight consultations and more still provided email submissions.

## Consultation Sessions

The Ministry of Agriculture opened the sessions by welcoming participants and explaining that the B.C. government will be using the information collected during the consultation to inform the design of the new provincial meat inspection system. The Ministry of Health clarified the goals and scope of the consultations sessions, provided a summary presentation on the findings of the BCAISR, and identified the questions for plenary discussion.

The goal of the consultations was to gather advice on the implementation of the new meat inspection program, specifically related to the implementation of recommendations and system options resulting from the BCAISR. The scope focused on the design of a new provincially run meat inspection system for provincially licensed class A and B abattoirs.

Topics identified as out of scope included the construction standards and technical inspection standards for Class A and B abattoirs; Class D and E licensing; and federal responsibilities such as the management of specified risk materials, cattle tag verification, and interprovincial trade. It was acknowledged that the federal responsibilities will need to be managed in the new system. The Province and the CFIA have begun discussions on the best approach.

The summary presentation on the findings of the BCAISR outlined the objectives and process of the review, as well as the recommendations and system options presented to the B.C. government. Given that time was limited for the consultation sessions, the questions posed were designed to gather implementation advice on the outcome recommendations where further input from industry could have the most influence, and on issues that were of greatest importance to industry as previously identified during the BCAISR.

The recommendations identified as important to continue in the new system – such as maintenance of third-party inspection, the use of a veterinarian and the graduated enforcement approach – were not specifically addressed at the sessions. However, session participants were encouraged to send any additional comments or information to the B.C. government email.

About 15 minutes were allotted to each question to allow participants to express their opinions and to support a discussion on any issues and potential solutions brought forth to inform the new system design. A note taker was present at each session to capture the main discussion points. Participants were informed that a consultation report would be released at the end of May 2012 highlighting the themes that arose during the sessions, and from email submissions.

The sessions were guided by the following questions:

- What is needed to support the marketing of B.C. slaughtered meats?
- What scheduling flexibility is needed in the new system?
- How could the activity of ensuring food safety in day to day abattoir operations be shared between government inspectors and abattoir staff?
- How could written plans for food safety and animal welfare be made effective and easy to use?
- What could an annual review of provincial abattoirs include?
- What measures for improving cost efficiency could be proposed?

## Consultation Outcomes

The input received from participants in person and in writing has been organized below according to the discussions questions posed during the consultations.

The summary below includes the common themes that arose according to the questions and discussions that arose. These themes do not necessarily represent participant consensus. In some instances, the suggestions of individuals are included where these furthered the discussions of the larger groups. Often, participants expressed divergent and conflicting opinions about how a future meat inspection system should be designed and the particular interests it should serve.

Responses varied from one consultation location to another, as well as by the industry sector (e.g., farming, meat processing and retail), and the scale and the style of businesses with which participants were affiliated. In many instances, the difference and disagreements between the opinions presented during the consultations echoed those that arose during the BCAISR. The topics that arose during discussions that were presented as out of scope were recorded, but not included, in the summary report.

Despite the diversity of input received, participants assumed common positions on two issues, as follows:

1. Meat inspection is a public good and should continue to be fully funded by the government.
2. Third-party inspection by the government is important to maintain provincial standards and support the continued confidence of the retail sector and public.

In this report, “full-time inspection” means the ongoing presence of a trained government meat inspector for the abattoirs to slaughter is required. Inspectors oversee each animal or flock before slaughter and examine each carcass after slaughter. This inspection model is called the *Enhanced Traditional* system in the BCAISR report. “Periodic inspection” means the government provides oversight of slaughter facilities through regular inspections with trained government meat inspectors.

Trained operators or staff examine all livestock and carcasses. The frequency of government inspection in each facility varies according to an “inspection profile” based on the complexity of a facility’s operation. For some facilities, this may mean that an inspector is present every slaughter day – for others, not. This inspection model is called the *Preventative Partnership* system in the BCAISR report. Both systems are identified as meeting high standards of meat safety.

## Session Questions and Responses

### 1. What is needed to support the marketing of B.C. slaughtered meats?

This question led to discussions on government communications about the provincial meat inspection system, the importance of market confidence in B.C. products, the frequency of government inspection and the funding of B.C.'s meat inspection system.

**Government Communication:** Participants said the B.C. government's support for the new meat inspection system will be critical to the marketability of products from provincially licensed abattoirs. They encouraged provincial ministries to cooperate with the federal government and the private sector to support existing and new marketing opportunities for B.C. products. Several specifically requested that the B.C. government look into establishing a B.C. brand for meats produced in the province. Participants often said that the inspection legend stamp used by inspectors is valuable because it demonstrates the B.C. government's involvement in the inspection system.

**Market Confidence:** Participants spoke at length about the importance of maintaining and improving the confidence B.C.'s consumer and retail sector have in B.C.-produced meats. Many stated that public confidence in the safety of B.C.-produced meat products is directly related to third-party inspection of provincially licensed abattoirs by the B.C. government. Others said that having the government publically express its support of and confidence in the new inspection system were critical to supporting the marketing of B.C. meats.

Participants from the retail industry confirmed that publicly stated B.C. government support of the provincial meat inspection system was important to their businesses' credibility and consumer confidence. They said the actual design of a meat inspection system and the frequency and method of government inspection were less important. In addition, they indicated that evidence of the B.C. government's involvement in and oversight of the inspection system improves retailer and consumer confidence in the products produced by provincially licensed abattoirs.

**Inspection Frequency:** Operators of larger abattoirs that process red meat generally preferred to maintain a system with full-time government inspection, in which the government inspects every animal and carcass in provincial abattoirs. For some, this preference was related to a desire to ensure inspectors will remain present full time in abattoirs while they operate. Others said that full-time inspector presence reduces a facility's liability in cases of food-borne illness.

Operators of smaller abattoirs and those that process poultry tended to be more interested in a meat inspection system that involves periodic government inspection. They expressed a willingness to receive the training in meat examination recommended for this system because this would provide them with maximum scheduling and operational flexibility. For example, such a system would allow these operators to accommodate clients who have not booked in advance and those who require slaughter services on weekends. The operators explained that the majority of their markets depend on their reputation and quality of work, and would not be negatively affected by periodic inspection.

**Publicly Funded Meat Inspection:** Participants said supporting the market for B.C.-produced meats entails supporting the meat processing industry through continued public funding of the meat inspection program. Both abattoir operators and livestock producers emphasized that their industries are too economically vulnerable to

absorb extra operational costs and sustain a viable business. Producers emphasized the narrow profit margins experienced by B.C. farms and raised concerns that if abattoirs had to pay for inspection, the costs would be downloaded to them through increased service fees. Many abattoir operators said their businesses are recovering from the significant costs associated with licensing and could not withstand further expenses.

## **2. What scheduling flexibility is needed in the new system?**

Participants expressed interest in two kinds of scheduling flexibility – increased availability of inspectors on a regularly scheduled basis and increased availability of inspectors on short notice. They also discussed scheduling flexibility in the context of different government inspection systems.

**Regularly Scheduled Availability:** Participants said the hours of operation for licensed abattoirs may be restricted based on the negotiated work-shift agreement established with CFIA and meat inspector availability in a region. Many operators expressed interest in having inspectors available to work more days, or different days of the week, on a regular basis.

**Short-Notice Availability:** Many participants requested that inspectors be available on short notice to provide services outside their work-shift agreements. Some recommended the province hire on-call inspectors who could provide services to provincial abattoirs on an as-needed basis.

A couple of participants suggested developing a farmer certification that would permit the slaughter of a farmer's animals without requiring ante-mortem inspection at the abattoir – or perhaps without any inspection at all. It was suggested this approach would lower the certified farmers' cost of having their animals slaughtered, and allow slaughter to occur on a more flexible schedule because an inspector would not need to be present during the procedure. Post-mortem inspections could be conducted a day or two later if organs and carcasses were properly labelled and chilled.

**Inspection Frequency:** Many opinions about how inspector flexibility should be improved were based on whether participants supported a system for full-time inspection or periodic inspection. Those who preferred periodic inspection stated this was the most efficient way of addressing the need for flexibility, as inspectors would not need to be present during all slaughter days in all abattoirs.

Operators of smaller abattoirs and those that process poultry said they would be willing to receive the meat examination training recommended under this system because this would provide them with maximum scheduling and operational flexibility. For example, such a system would allow these operators to accommodate clients who have not booked in advance and those who need slaughter services on weekends. Some expressed concern that smaller abattoirs may have difficulty paying for the meat examination training required for the periodic inspection model, and that those costs would increase with employee turnover.

Participants who supported full-time inspection recommended that the B.C. government ensure inspectors are available to provide services more often – both for the requested work-shift agreements and on short notice as needed. These operators did not wish to exchange increased scheduling flexibility for reduced inspector presence. They expressed concern about having to communicate to farmers that they – rather than a government inspector – had decided to reject an animal from the food system, as this would be a cost to farmers and could cause tension. Concerns were also raised that staff turnover might make it difficult for

abattoirs that are not owner-operated to maintain the knowledge base in meat examination required to support a meat inspection system with periodic inspection.

**Dual Systems:** A few participants suggested that some licensed abattoirs could operate under a flexible inspection system, while other abattoirs received government inspection of every animal. Some participants suggested the choice of system should be up to the operator, while others felt that periodic inspection should be a reward for abattoirs that demonstrate consistently good performance and compliance over time.

The majority of participants, however, did not support these suggestions. They said having two inspection systems operating in the province could create the impression for customers that food safety standards were inconsistent across provincially licensed facilities, and that this would jeopardize the industry's image and the marketability of B.C. meats. Also, operators who preferred full-time inspection did not see periodic inspection as a "reward."

### **3. How could the activity of ensuring food safety in the day-to-day operations of abattoirs be optimally shared between government inspectors and abattoir staff?**

This question led to discussions about potential training for abattoir operators and staff, and the importance of food safety.

**Operator/Staff Training:** Several participants said training for abattoir operators and staff would raise the overall level of knowledge in licensed facilities about meat hygiene, along with livestock health and welfare. Some operators were interested in general training for themselves or their staff. Others expressed interest in training and certifications that would allow them to operate in a flexible inspection system by teaching them to assess the health of livestock and the health and hygiene of carcasses.

Many questions were raised about the logistics of potential trainings for operators and staff. For instance, some participants asked about the cost of trainings and the number of trained or certified abattoir workers who would need to be onsite when an abattoir operates. Some participants stated it would be challenging to design a system that relies on the training of abattoir workers in large and small abattoirs. The concerns raised earlier in the session regarding paying for training of abattoir staff came through in this question as well.

**Importance of Food Safety:** Participants generally agreed that the primary aim of the new inspection system and third-party inspection should be to maintain provincial standards for food safety. Participants warned the B.C. government not to compromise on this objective in order to deliver upon scheduling flexibility, cost efficiency or other system objectives. Several participants made the point that if a single food safety incident occurred, it could easily affect the entire provincial meat industry.

During discussion on this question, it was also noted that many participants were concerned about the possibility of having the B.C. government introduce a system whereby industry assumed full responsibility for inspecting their own facilities. The majority of the participants agreed they would not support the introduction of this type of system and preferred to continue working in partnership with government inspectors.

#### 4. How could written plans for food safety and animal welfare be made effective and easy to use?

In responding to this question, participants primarily discussed the advantages of food safety programs and raised some concerns about their design and implementation.

Operators who currently implement food safety plans beyond the requirements of the B.C. Meat Inspection Regulation noted that they consider these plans to be beneficial for their operations. They use them to support staff training, product marketing and improving food safety in the abattoir. They also pointed out potential advantages in having the plans available for inspectors to consult, whether or not that is required.

These and other participants nonetheless noted that food safety plans requiring full implementation of Hazard Analysis Critical Control Point (HACCP) system (such as those required of federally licensed abattoirs) would be too onerous for B.C.'s smaller slaughter facilities. This is because HACCP plans typically require extensive record-keeping that may occupy some staff full time. Recommendations were made for the development of a "HACCP-like" food safety plan that could be accommodated to different sizes and volumes of operations.

One concern raised in all sessions was the need to ensure that accountability for animal welfare continues in the new system, especially if a government inspector will not always be present. Animal welfare advocates supported the proposed use of video monitoring to collect ongoing visual records of livestock lairage and slaughter in a periodic inspection system.

#### 5. What could an annual review of provincial abattoirs include?

Participants stated their preferences regarding a provincial audit system for abattoirs, and also asked for an appeal board, which could be operated by the same agency.

**Audits:** One of the most common positions presented was that facility audits should be conducted by an agency other than that which provides inspection services. Most agreed that audit results should be available to the public. Participants generally preferred a pass/fail audit system rather than a score-based system, which was seen as more subjective and potentially confusing for the public. Although it was felt that facility audits could be useful for both operators and the public, many stated the process should "be supportive" and help slaughter facilities improve their performance without using an overly punitive approach.

Several participants said the process should involve minimal paperwork and be designed with the varied scale of the abattoir operation in mind. Many stated that if audits require extensive documentation they could become prohibitive for small facilities. Participants generally favoured an audit system that evaluates all aspects of abattoir operations, rather than an approach where only one aspect is explored in great detail – as is the case in other jurisdictions. However, some participants stated there is no need for audits if inspectors are present full time, but agreed that if audits were established, then the work of inspectors should be reviewed as part of the review process.

**Appeal Process:** Operators and abattoir staff identified a need for arbitration or an appeal mechanism that operators could access when they disagreed with decisions or actions related to their operations. Operators said the current system, which requires them to present any grievances to the inspectors' supervisor, does not provide them with a sufficiently independent arbiter or further avenues of appeal. Operators asked that an independent office, position, or board familiar with the slaughter industry be established to render swift, binding decisions for resolving disputes.

## 6. What measures for improving cost efficiency could be proposed?

Many participants expressed reluctance about discussing cost effectiveness in the future inspection system. It was proposed that the cost of inspection is the cost of maintaining a viable industry and ensuring the safety of B.C. meats. Participants strongly said the inspection system should continue to be fully funded by the government, and many said the system's cost will be outweighed by the food safety benefits for consumers.

Several strategies for using inspector time more efficiently were put forth. Operators noted that in some cases the number of inspectors assigned to larger facilities could be reduced, either overall or on days when production volumes are lower. Some operators suggested inspectors take on more responsibilities in the abattoirs to improve the value for money invested in the inspection system. Conversely, others recommended that abattoir staff take on some inspector responsibilities to reduce the time required for inspectors in provincially licensed facilities.

One participant noted that since the number of inspectors assigned to an abattoir is standardized based on the volume of animals processed, on low-volume days there may be more inspectors assigned to an abattoir than necessary. The suggestion was made that the B.C. government hire part-time and on-call inspectors who work only as needed. Others noted that such an arrangement would also provide greater flexibility in the availability of inspectors.

The necessity of having a government inspector travel to remote locations to be present for the slaughter of a small number of animals was questioned. Some wished to see the B.C. government address this within the new system.

### Additional Advice and Comments

Some of the implementation advice received did not directly respond to the questions posed during consultations but does bear on the development and operation of the new inspection system. This was especially the case with written email submissions.

**Illegal Slaughter:** Illegal slaughter activities that take place outside licensed premises were often identified as a concern. The concern was that there is no oversight of meat hygiene, livestock treatment or waste disposal on unlicensed slaughter premises, and that food safety, animal health and environmental management standards could easily be compromised, as a result. If meat from illegal slaughter is accepted by meat processing facilities and enters the public food system, it might endanger consumers. Farmers and abattoir operators expressed reluctance about reporting illegal slaughter in their community themselves, but encouraged the B.C. government to increase enforcement measures.

**Meat Processing:** Some participants noted that meat processing facilities receive less government oversight and inspection than abattoirs do. Several recommended the new meat inspection system provide inspection to meat processors as well, such as those in Class A slaughter facilities.

Many participants felt it was important for the operators to be involved in developing any new food safety or operator requirements in the new meat inspection system. Several expressed a desire for the B.C. government to engage retailers who buy B.C. meats in developing the new system to help ensure ongoing market confidence. Regular review and testing of the meat inspection system by the Province was also suggested.

## Next Steps

The input from the consultations, together with the information and recommendations provided by the *Report on the B.C. Abattoir Inspection System Review*, will inform the development of a new meat inspection system in B.C.'s provincially licensed Class A and B abattoirs. The BCAISR report notes that key challenges in the development of a new meat inspection system include:

“...establishing strong market confidence and delivering sufficient flexibility to meet a wide range of abattoir operator needs so that larger abattoirs that sell into complex markets and smaller abattoirs that sell locally can maintain food safety standards while participating in a system that is workable for them, their clientele and consumers.”

The input received during the consultations and described in this report corroborates the observation that the B.C. government will face challenges in implementing a meat inspection system that responds to the needs of all parties. This is especially true in an industry as diverse as B.C.'s meat processing industry, and which serves a developing market for B.C. meat products.

Participants' input during the consultations also provides insight into how members of various industries and interest groups would like to see their interests addressed, and identifies priorities and “negotiables” that can inform a balancing of interests in the new system. The active participation of the B.C. meat sector (including livestock farming, slaughter, food processing and retail industries) in the consultations was pivotal to developing the recommendations of the BCAISR. Similarly, the sector's continued support of, and participation in, the development of a new inspection system will be of central importance as the B.C. government prepares to implement the recommendations and operate a new provincial meat inspection system.

The design and structure of the meat inspection system will be confirmed by the Province this year. Guided by the B.C. government's direction, the Ministry of Health will lead the development of the new system with collaboration from the Ministry of Agriculture, the BC Centre for Disease Control, other provincial agencies and members of the provincial meat industry. The new meat inspection system will be operational by December 31, 2013.