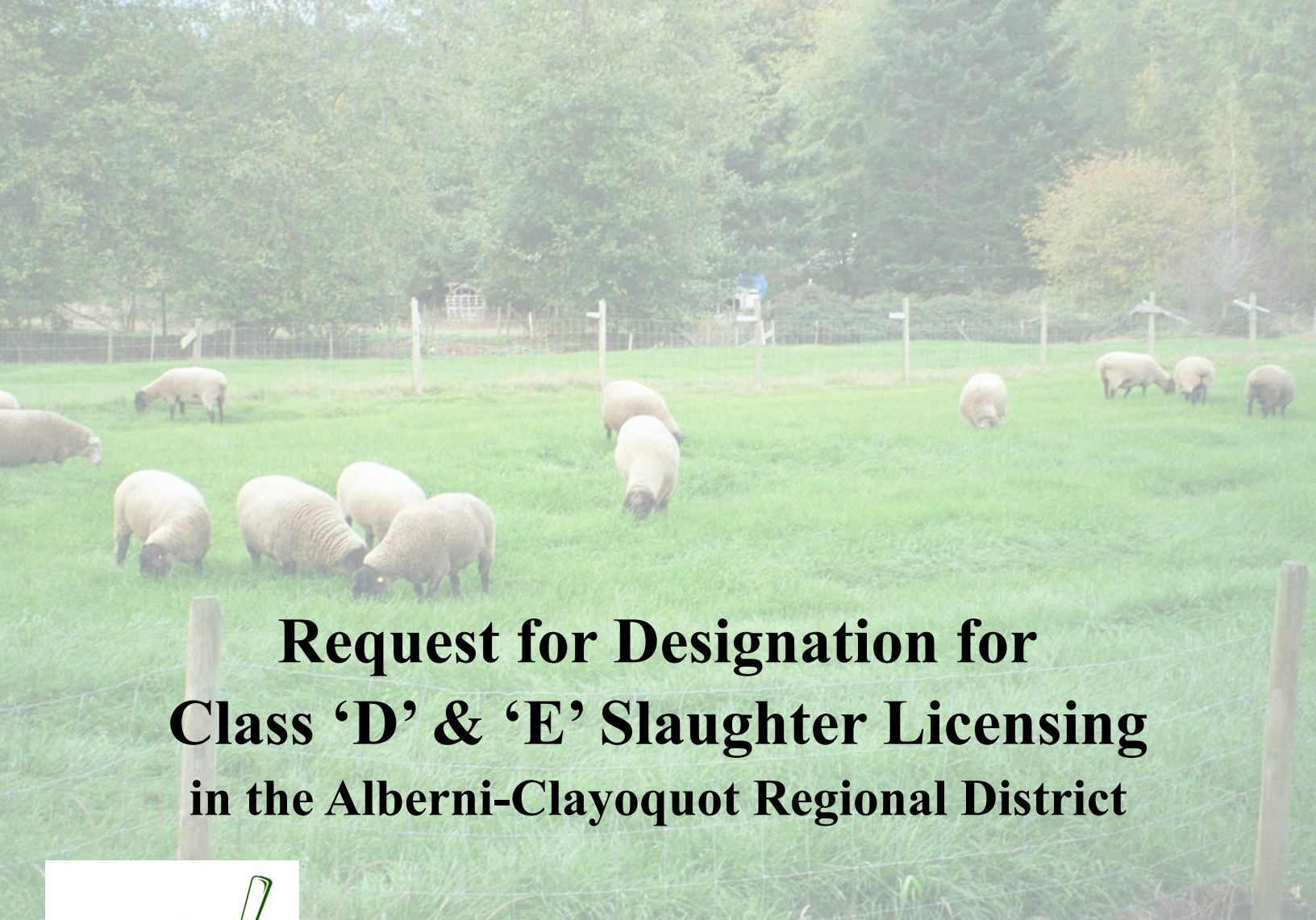




Request for Designation for Class 'D' & 'E' Slaughter Licensing in the Alberni-Clayoquot Regional District



~ Background Document ~

Originally published April 2017 and updated June 2018

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ALBERNI-CLAYOQUOT
REGIONAL DISTRICT



ALBERNI-CLAYOQUOT REGIONAL DISTRICT

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May 25, 2017

Makenna Cyr, President
Alberni Farmers' Institute

Ms. Cyr,

Since the adoption of the Alberni Valley Agricultural Plan in 2011, the Alberni-Clayoquot Regional District (ACRD) has been actively working to support the agriculture industry and increase food security in the region. Through the work completed by the ACRD Agricultural Development Committee, the lack of red meat slaughter facilities in the Alberni Valley has been identified as a key roadblock in allowing the local livestock industry to thrive.

Developing local slaughter facilities in the Alberni Valley will work towards achieving some of the primary goals identified in the Plan including encouraging growth of forage based livestock and promoting marketing of Alberni Valley agricultural products.

The proposed change to the Meat Inspection Regulation to allow small-scale Class 'D' and 'E' slaughter facilities in the ACRD would support local producers need for safe and accessible slaughter services and would serve to stimulate livestock production in the region. It is our belief that over time increased livestock production and capacity will benefit the feasibility of a full inspection facility in the long term.

On behalf of the ACRD Board of Directors, I would extend our support for the project and endorse the Alberni Farmers' Institute's request to include the Alberni Clayoquot Regional District as a designated region for Class 'D' and 'E' slaughter licensing under the Meat Inspection Regulation of the *Food Safety Act*. I would also provide that the ACRD is willing to work with the Ministry of Agriculture to research and monitor the impact of regulatory change as a case study within our Regional District.

I would like to thank you for the work being done to support agriculture and food security in our region.

Best regards,

John Jack, Chairperson
Alberni-Clayoquot Regional District

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1) Executive Summary

Since 2004, changes to the BC Provincial Meat Inspection Regulations have posed significant challenges to small and medium sized livestock producers. The 2011 BC Census of Agriculture shows a 5-year decline in beef, chicken, and pork production of between 24 and 30%.

In a 2015 survey, 67% of Alberni Valley producers stated they would increase their production if a local red meat slaughter facility were available. Currently, their only option for licensed slaughter requires significant travel distance, resulting in increased production costs, significant stress to animals, and a reduction in meat quality. Farmers are forced to outsource work they have traditionally done themselves, and they lose the ability to market some animal parts. All of these factors reduce profits and farm viability. Coastal producers within the region have even longer travel times and a second mountain pass to navigate.

In 2016, the Alberni-Clayoquot Regional District (ACRD) commissioned a study to assess the feasibility of the Class 'A' type slaughter facility allowed by current regulations. The study projected a cost at over \$540,000. Similar projects in other regions have accrued actual costs of over \$800,000. Following release of the study, and after discussion and deliberation, producers came to a consensus that a Class 'A' facility was not a realistic option in the present climate. A subsequent Class 'B' study yielded similar results.

As an alternative measure of support, *Alberni Valley producers respectfully request that the Alberni-Clayoquot Regional District be classed as a 'designated region' under the Provincial Meat Inspection Regulations, in order to allow for licensed, small-scale 'Class D' and 'E' slaughter facilities.* They commit to working with the government and other stakeholders to monitor the impact of such a project, by tracking and documenting the resultant growth in the industry.

Dissatisfaction with the current regulatory framework has been raised in many jurisdictions and by the BC Chamber of Commerce, clearly demonstrating the need for policy amendment or review. Red meat slaughter services will stimulate local production and increase agricultural interest in a region which is well-suited to livestock production. It is anticipated that the resultant growth in the industry will significantly improve the feasibility of a fully inspected Class 'A' or 'B' facility in the future and the likelihood of a sustainable and vibrant local livestock industry.

2) Introduction

This document was developed as a joint initiative between the Alberni Farmers' Institute and the ACRD. It was indicated by the demonstrated need for slaughter support for farmers and the lack of feasible alternatives within the region. It aims to create a system where ACRD producers can legally process and sell red meat directly to customers, in full compliance with best food safety practices and with the oversight, monitoring, and collaboration of regulatory agencies.

3) Details of Alberni Producers' Request for Regulatory Changes

Following are the specifics of the Alberni Valley Producers request:

The livestock producers of the Alberni Valley, with the support of the Alberni-Clayoquot Regional District, request that the Province of British Columbia include the Alberni-Clayoquot Regional District as a 'designated region' under the Meat Inspection Regulations of the BC Food Safety Act. B.C. Reg. 205/2014. This would allow producers in the region to apply for Class 'D' and 'E' licenses for on-farm slaughter, greatly supporting the producers' need for safe and accessible slaughter service. In addition,

this would serve to stimulate production in the region, enhancing the local economy and food sovereignty, and increasing the feasibility of a fully inspected facility in the long term.

Many Alberni producers have expressed interest in establishing Class ‘D’ or ‘E’ facilities when the regulatory change is complete. Examples include Stonehaven Farm, a 176 acre producer of beef and lamb and Coleman Meadows Farm, a water buffalo dairy.

The Alberni Farmers’ Institute, with the assistance of local government, commits to working with Provincial government to research the impact of this regulatory change by tracking and documenting the resultant growth in the industry and any other outcomes.

4) Meat Inspection Regulations

A summary and background of the existing regulatory framework.

Historically, farmers made their own arrangements for livestock slaughter and sold their meat products directly to customers. This changed in 2004, when farmers became required to operate under the auspices of the Meat Inspection Regulations of the BC Food Safety Act. B.C. Reg. 205/2014. These changes were driven in part by the Bovine Spongiform Encephalopathy (BSE) crisis in Europe in the late twentieth century. BSE is caused by feeding animal parts to livestock, which is not typical of small-stockers and which is now very well-known and discouraged in the industry.

There are problems with centralization of slaughter and meat packing services. In 2012, the biggest meat recall in Canadian history stemmed from E-Coli contamination at a CFIA inspected meat packing plant, XL Foods, in Southern Alberta. This was *after* a listeriosis outbreak in 2008 at Toronto’s Maple Leaf Foods packing plant that killed 23 people. Contamination generally stems from negligence in following safe meat handling practices and inspection guidelines. Problems are enhanced by the prevalence of uninvested and unaccountable workers in the plants, and the high potential of cross-contamination from the many animals. Traditional small scale and on-farm slaughter operations lack these causal factors.

The Provincial Meat Inspection Regulations rely on a graduated licensing system as per the following table:

Table 1: Licenses Available Under the Graduated Licensing System

License Type	Activities Permitted	Sales Permitted	Geographic Scope	# of Animal Units	Oversight
<u>Class A</u>	Slaughter and cut and wrap	Retail and direct to consumer	B.C.	Unlimited	Pre and post slaughter inspection of each animal
<u>Class B</u>	Slaughter only	Retail and direct to consumer	B.C.	Unlimited	Pre and post slaughter inspection of each animal
<u>Class D</u>	Slaughter only (own animals and other peoples' animals)	Retail and direct to consumer	Sales restricted within the regional district where meat is produced	1 - 25	Periodic site assessments and audit of operational slaughter records
<u>Class E</u>	Slaughter only (own animals only)	Direct to consumer only	Sales restricted within the regional district where meat is produced	1-10	Periodic site assessments and audit of operational slaughter records
Personal Use No licence required	Slaughter only	None	For producer only	Unlimited	None

At Class ‘A’ and ‘B’ facilities, each carcass is fully inspected. Unlimited numbers of animals can be slaughtered and the product can be sold throughout BC. A small facility completed by the Windermere Farmers’ Institute in 2016 had a total project cost of over \$800,000 and a co-operative facility constructed on Saltspring Island had a total cost of over \$450,000 in 2012.

Class ‘D’ & ‘E’ licenses are only available in designated regional districts and were developed in 2010 to address the need for slaughter services in remote areas. They permit the slaughter of a small number of animals on-farm and are overseen by local Health Authorities. A *Code of Practice for Rural Slaughter Establishments* was published in 2013, and all operators must take part in a *Slaughter Safe* course. Regional District boundaries were used established as the arbitrary measure for designation, based on the distance from existing Class A or B facilities. The particular constraints of individual regional districts were not taken into account, nor were local communities consulted, other than in the Bella Coola, Queen Charlottes, and Powell River area. ***The Alberni-Clayoquot Regional District is currently not a designated district.***

Outside the designated regional districts farmers can apply for Class ‘E’ licenses but must prepare and submit a feasibility study and they are unlikely to be approved if outside of a designated area (as per ministry website). The 2018 system review and consultation processes are the first since the establishment of the D/E licensing system in 2010.

Public Requests for Review

The 2011 BC Census of Agriculture shows a 5-year decline in beef, chicken, and pork production of between 24 and 30%, and many communities around the Province have requested changes to the Meat Inspection Regulations. The District ‘A’ Farmers’ Institute, which is an umbrella organization for various Farmers’ Institutes on Vancouver Island and the Sunshine Coast, has brought the subject to the Provincial Government annually since 2013. Resolutions in support of tailoring the Meat Inspection Regulations to small-scale producers have been adopted 4 times at the Union of British Columbia Municipalities (UBCM) conventions since 2009 (2009–B133, 2008–A2, 2010–B39, & 2016–B39). The 2016 resolution from the Thompson-Nicola Regional District was adopted as amended to read: ***“Be it resolved that UBCM urge the Province to change the policy on allowing unlimited Class E licenses and a minimum number of Class D licenses (market driven) for local livestock producers”***. The BC Chamber of Commerce issued a strong call for similar regulatory changes in a 2015 policy statement. This statement was recently re-endorsed by the Chamber.

5) Alberni Valley Livestock Industry - Background

The livestock industry in the Alberni Valley is in decline. Various support mechanisms have been investigated. Producers and the ACRD’s Agricultural Development Committee have come to the consensus that Class D and E licenses are required to stimulate production.

General Agricultural Environment

In 2011, the Alberni-Clayoquot Regional District completed an agricultural plan which documented the status of the agricultural industry in the region. It noted that the agricultural sector was relatively small but there were 89 farms with 3,171 hectares (7,832 acres) that were currently farmed. The acreage farmed represented about 41% of the land in the Agricultural Land Reserve (ALR). Livestock production dominated, with 90% of the farmed land devoted to the raising of livestock. According to the report, the Alberni Valley produced between 5 and 11% of the volume of food consumed by locals. A regional livestock survey showed the production volume in 2015 to have been 180 beef animals, 23 hogs, 182 lamb, 10 goats, and 10 water buffalo.

The production of livestock is in decline, a major part of which is due to the near disappearance of the local dairy industry. The BC Meat Inspection Regulations which were adopted in 2004 also had an impact

on livestock production as it restricted local sales of meat to consumers by requiring meat to be processed in a licensed abattoir.

There is one inspected abattoir in the Alberni valley which processes poultry (Al's Feathers Be Gone) but there is no licensed or inspected red meat facility. Vancouver Island has a number (7) of Class A licensed abattoirs but all require a significant travel time and distance through a winding and busy mountain pass.

Livestock producers in the area are facing increasing demand for quality locally produced meat and local processing is a key requirement. ***As noted in the 2011 Alberni Agricultural Plan, "the lack of a local abattoir facility has been identified as a key roadblock" for the livestock industry.*** Other communities have shown significant increases in livestock production when a local abattoir is available. A slaughterhouse opened on Saltspring Island in 2012, and production of lamb was shown to have increased 60% between 2008 and 2015 (Macy & Thomson, 2016).

Class 'A' Feasibility Study

A 2014 survey of producers by the Alberni-Clayoquot Regional District showed that improved access to slaughter services was a top priority. In 2016, with the active encouragement of the ACRD and funding from the Investment Agriculture Foundation of BC, a feasibility study for a red meat abattoir was initiated and completed. Following are a few of its findings:

- Potential gross revenue for a Class 'A' red meat abattoir to meet local needs, based on a 80% capture, was about \$140,000
- With appropriate financial structure (no debt) a properly sized abattoir could break even or generate a small profit at this level of sales
- The capital cost was estimated to be \$550,000
- Waste could be disposed of at a reasonable cost in an acceptable manner
- A two acre parcel of land would be needed
- The ACRD is very supportive of it's livestock producers
- There is a lack of a proponent/operator to do the project
- A qualified manager and/or employees will be challenging to recruit, in part due to seasonality of the operation (only 1/3 of the year) and in part by nature of operation
- There is a lack of equity capital to fund the project and a lack of debt financing and appropriate grants available
- Community consensus and a strong will and desire is essential for success.

Community Feedback on Feasibility Study

A community meeting was held on October 27, 2016 to review the results of the study and decide on a course of action. There was general support for development of a Class 'A' facility, however the overriding sense was that it was not feasible, due to lack of funding, management, and adequate production numbers. Farmers also expressed ***an urgent need for better access to legal slaughter options. The consensus was to work towards changing the current regulatory structure in order to allow for legal on-farm slaughter and sales within the regional district.*** They identified the following as constraints to pursuing a Class 'A' facility in the present:

- Lack of community desire and consensus: producers don't believe there will be 80% catchment indicated by study, as some large producers send directly to grocery chains via Gunter Bros Meats.
- A belief that the costs of building will over run estimates, due to both historical and current examples elsewhere in BC
- Lack of trust and commitment to new or unknown operator
- No existing assets which could be converted to a Class 'A' or 'B' red meat facility are available within the region.

6) Benefits of On-Farm Slaughter

Class D and E licenses allow for on-farm slaughter of livestock. Benefits are financial, social, and ecological, as summarized in the following table:

Table 2: Benefits of On-Farm Slaughter

Financial	Social	Animal Welfare / Ecological
Significant reduction in cost of slaughter per animal	Traditional skills sharing is increased and encouraged	Farmers control the short time between life and death, rather than subjecting animals to drawn out process which can last up to 24 hours
Farmers retain more of their traditional livelihood, rather than contracting out services	Community skill set is broadened rather than centralized in out-of-region plants.	
Can sell up to \$300 more per animal via parts not able to be retrieved from Class 'A' plants	Training in safe food handling and safety procedures are more widely undertaken.	Reduction or elimination of animal transport results in further reduction in stress
Farmers would save the financial hard costs of time and travel (estimated in section 7 as \$440 per slaughter event)	Increased local labor opportunities for seasonal and/or under skilled laborers	Reduction in carbon emissions due to significantly reduced travel times
No competitive disadvantage under farmers who do not have to transport out of region	Increases general community self-sufficiency, autonomy, and food sovereignty	Food safety risk is minimal in a small and localized system.
Opportunity for Alberni producers to market directly to lucrative West Coast restaurants	Enhanced neighbor and community relations	Traceability is improved by direct farm to consumer and local retail business relationship
Reduction or elimination of animal transport results in higher quality meat product	Generates community culture and shared intention	Reduction in bio-security issues when slaughtering on-farm with a limited numbers of animals
Stimulated local sales through public marketing campaign of on-farm slaughtered products	Increases local slaughter options for producers	Limits the spread of pathogens and disease through different geographical regions
Reduces challenges associated with the seasonal employment at Class 'A' facilities	Rebuilds producers' trust in government	
Class 'D' licenses would take away less business from existing Class 'A' facilities than would an additional Class 'A' facility	Allows producer independence and sense of autonomy within a solid regulatory framework	
Increases slaughter capacity Island-wide in the busy season	Increases local and ethical food access for residents	
Increased production potential and local services will bring new producers to industry	Provides regulatory framework and oversight for a practice which is now occurring behind closed doors	
Assists with local transition to Class 'A' or 'B' licenses		

Economics and Growth

Four Class ‘D’ slaughter licenses in the ACRD could process up to 100 animal units per year, a significant percentage of current local production. These facilities could likely be established at a cost of significantly less than the cost of a Class ‘A’ facility.

There is evidence that small on-farm slaughter facilities may expand their operations over time. In Kimberly, Gwinner’s Country Butcher expanded from a Class ‘E’ to a Class ‘A’ facility as did Rocky Acres Ranch in Fernie. In 2013, a pilot project in the Regional District of North Okanagan allowed two new Class ‘E’ facilities to open in a non-designated area, and reportedly, both have subsequently expressed interest in expanding operations.

North Island College, Port Alberni Campus, has indicated an interest in working with the Alberni-Clayoquot Regional district and the BC Association of Abattoirs to develop and conduct a Meat Processing Educational Program, acknowledging the need for such a program in the Province. Their support could include storage, equipment, and kitchen facilities in addition to program development, however a licensed slaughter facility is required. A letter from North Island College is included as Appendix 7.

7) Current Challenges to ACRD Producers

ACRD livestock producers are at a competitive disadvantage under the current regulatory system. This disadvantage stems mainly from the physical geography and distance to existing licensed facilities and the reduction in meat quality due to the stress of travel. Other challenges include the long wait times for slaughter and the inability to retrieve many of the animal parts that could add value.

Distance

The Port Alberni area is served by BC Highway 4 which originates from the east side of Vancouver Island and terminates on the west coast. As per Wikipedia, it is the longest east-west main vehicle route on Vancouver Island, with a total length of 163 km.

Alberni farmers generally go to one of two main processing facilities, Gunter Bros Meat in Courtney or Plecas Meats in South Nanaimo. The following table notes the time and distance, according to Google Maps, of a one-way trip from three Alberni area farms. Note that 2 return trips are required for each slaughter event: one to bring the animals and another to pick up the meat. ***Road conditions and travel with livestock significantly alter the travel time indicated***, as described in the next section.

Table 3: Travel Distances, Farm to Slaughter

One-Way Travel Distances and Time From Farm to Slaughter - Per Google Maps		
Farm	Gunter Bros	Plecas Meats
Cottonwood Farm 6306 Fergusson Road	120 km 1hr 28 min	99 km 1 hr 16 min
Stonehaven Farm 8600 Bryson rd	132 km 1 hr 44min	111 km 1hr 29 min
Coleman Meadows Farm 6670 Coleman Rd	124 km 1 hr 31min	103 km 1 hr 19 min

Road Conditions

Travel on highway #4 between Port Alberni and Parksville is a major problem for commercial traffic. It is a very busy stretch of highway with a traffic volume of 8830 cars per day (2009) near Port Alberni. The 2 lane paved road has a number of constricted areas with low speed limits.

In 2007, the ACRD established a committee to promote an alternative route to the region in response to the following issues:

- Poor reliability and accident history of the existing route
- Increased truck traffic since the closure of the railway
- Increased traffic to the west coast (from 762,710 in 2011/12 to 943,860 in 2015/16)
- Extensive delays on the existing route due to traffic accidents and storm events

In 2008, the committee hired RF Binnie and Associates, BC engineering consultants, to cost out an alternative route and perform a cost benefit analysis. The ACRD has authorized the use of their report to help rationalize the need for local meat processing. Relevant findings are described below and a full excerpt is provided in Appendix 2.

Table 4: Description of Highway 4, from Commissioned Study

Description of Hwy 4 from Whiskey Creek Store to Mount Arrowsmith/Loon Lake intersection: Source: R F Binnie and Associates Ltd. (2008).	
Roadway Geometry	• Very winding road with many speed advisories (8 curves with 60km/h, 4 with 50 km/h, 4 with no suggested speed reductions) • Limited opportunities to pass, long queues of vehicles, and many frustrated drivers. • High accident rate which causes significant delays
Speed	• The average travel speed is about 5 km/hr less than the posted speed, and often much lower due to tourists, weather, or truck volume • Traffic often parked on both shoulders and people crossing to get to the beach at the east end of Cameron Lake causes hazards and narrowed driving lanes. • Traffic often stopped in Cathedral Grove • On the steep grades trucks often travel less than 30km/hr • Trucks and recreational vehicles must travel very slowly to negotiate the sharp turns • Passing lanes are often unusable because of one slow truck passing another
Reliability	• Highway 4 is the only route into the Alberni Valley and West Coast communities • Frequent closures due to accidents or weather and closures last an average of 2 hours. Some have lasted for up to 2 days. • Closures have a major impact on many stakeholders • The delay rate is 97.6 hours/100km/year which is high compared to that of even the Sea to Sky highway, which is 72 hours/100km/year.
Accident Rates	• Driving highway 4 is very challenging due to the curves and small shoulders. • The accident rate is 0.64 accidents/million vehicle kms, above the provincial average of 0.5 for a two lane arterial highway.
Cathedral Grove	• There are regularly violent windstorms in the area which cause limbs and trees to fall, posing safety and reliability concerns. • Deficient parking leads tourist to park on shoulders, further narrowing the highway • High pedestrian level crossing the highway, or people stopping traffic to back up their recreational vehicles causes traffic backups and hazards

Description of Hwy 4 from Whiskey Creek Store to Mount Arrowsmith/Loon Lake intersection: Source: R F Binnie and Associates Ltd. (2008).	
Passing Opportunities	Limited passing opportunities and the long queues of traffic create driver frustration

Actual Travel Time

All producers surveyed noted that, because of road conditions, delays, and the constraints of carrying livestock, a return trip to a licensed facility takes a minimum of between 5-6 hours. In addition, animals need to be secured at the abattoir facilities prior to 8am or before 5pm. As such, animals must be transported the day before and left in restrictive pens at the slaughter facility overnight. They are often housed with unfamiliar animals, and are subject to the distinct smells of the abattoir facility. This increases stress and decreases muscle tone and meat quality of the animal.

The trip will need to be repeated to pick up the meat products. Most producers do not have refrigerated trucks to transport the meat back to the Alberni Valley. *The BC Center for Disease Control's 'Guidelines for the Safe Transport of Carcasses, Poultry and Meat Products' (2012) advises to never leave meat unrefrigerated for more than two hours.* This poses a challenge with the long transport time and unreliable road conditions required to get the meat back to the Alberni Valley. The cost of refrigerated trucking is very high. The following chart illustrates the documented experiences of one individual producer.

Table 5: Travel Log, Nighthawk Ridge Farm

Travel Log - Night Hawk Farm to Gunter Bros Abattoir					
Date	Animal	Hanging Weight	Slaughter Costs	Kms	Time
Jan 8, 2016	Teddy	635	\$626.06	290.4	5 hrs return
Mar 30, 2016	Sugar	843	\$1170.38	290.4	5 hrs return
May 25, 2016	Smokey Ranger	224 397	\$288 \$417.75	290.4	5 hrs return
Oct 6, 2016	Nora	576	\$609.78	290.4	5 hrs return
<u>Totals for 4 slaughter events</u> Total Kms: 1161.6 x 2 (drop off and pick up meat) = 2323.2 km Total Vehicle Cost: 2323.2 x \$0.50/km (standard rate) = \$1161.6 or \$290/event Total Time: 40 hours					

Wait Times

Livestock slaughter is, in most cases, a seasonal operation. *ACRD producers have consistently expressed frustration with delays in securing slaughter dates at established facilities.* A Facebook post by Gunter Bros Meat on August 24, 2016 states that their next available slaughter date is in November. This degree of wait requirements pose the following challenges:

- Producers must book dates months in advance, without knowing when weather conditions and livestock growth will be ideal

- Producers may have to either slaughter in the middle of prime pasture quality or hold their animals after prime pasture season, while animals lose weight and supplemental feed is needed. A loss of 5-10 pounds of weight is 10% of a sheep carcass and can take up to 2 additional weeks to rebuild.
- There are financial losses due to lowered animal weights and/or additional costs for supplemental feed

Competitive Disadvantage

As per the following chart, at a living wage of \$17/hour, the currently required travel for one processing event translates to a cost of \$460 more than what would be required for local processing. Because busy facilities are often not able to take more than one animal in at a time, this additional cost may be added to each animal. One 50 pound lamb sold for \$9/lb yields a total income of less than this amount. ***Currently, the requirement to travel out of area for licensed processing is relevant in every case that an animal product is to be sold legally. This includes an order as small as one rabbit.*** ACRD producers at a direct disadvantage to other communities where local slaughter is available, and ***the financial cost of out-of-area slaughter is prohibitive of industry sustainability.***

Table 6: Additional Costs to Producer for Non-Local Slaughter

Cost to Producer for Non-Local Slaughter Using Nighthawk Ridge Farm's data, with 2 trips required for each slaughter event		
Time (\$17/hr)	Vehicle/Trailer (\$0.50/km)	Total
\$170	\$290.4	\$460.4

8) Producers' Commentary

Expansion of Class 'D' and 'E' licenses is not a step backwards but forward. These exist already and must follow food safety plans. They simply put money back into the hands of farmers and keep food systems local.

I've used a company to transport meat back to Port Alberni. There was no set price or schedule, and it was expensive.

Fear makes people go underground

If I had 16 rabbits, I would have to make two trips to Nanaimo and pay \$8 each to have them processed. If I sold them at \$9/lb I would make a total of about \$430. The cost of slaughter and gas alone would be about \$208, and it would take me at least 7 hours. That means I get \$222 for the 7 hours of transport time, the cost of their feed and housing needs, and all the time I take to raise them. How is a small producer supposed to make a go of it?

Farmers have to butcher at the optimum time to get the best \$. Depending on pasture quality, weather, and customer demand, it is hard to predict and plan far in advance.

Food safety would be increased if there was oversight, training and local skill development in on-farm slaughter.

I would raise 5 times as many pigs if I could slaughter on-farm

D & E licenses would increase the Island's slaughter capacity in the busy season

What are we supposed to do with an injured animal?

If Class D licenses don't come about there will be less production instead of more.

I still don't, and never will believe that going back to on farm slaughter is a bad thing. There are too many reasons to list, but the top three in my book are livestock stress, pathogen exposure and the dollars lost to the farmer from loss of offal.

Many farmers don't have refrigerated trucking to bring the meat home

The commentary of Alberni producers is important; not only to hear their perspective and concerns, but because *this commentary becomes the story of livestock production in the region.* This story influences the economic potential and success of the local industry by discouraging production and stakeholder investment.

I don't think Port has enough animals to make a special transport trip 'worthwhile' for the processor on a regular basis.

I can't afford to feed and carry over livestock when I can't get processing dates in fall.

Having a choice of processors that includes local options would increase the strength of relationships within our farming community

I could make an extra \$300 from one cattle if I could sell the parts I am unable to get back from inspected facilities.

Small small scale and local processors allows farmers the right to choose when they want to market their product.

9) List and Description of Stakeholders

A variety of stakeholders may be impacted by changes to the Meat Inspection Regulations. The roles and standpoints (if known) of key groups are described below. Each entity will have valuable insight and consideration going forward.

Alberni-Clayoquot Regional District

The ACRD is a federation consisting of member Municipalities: City of Port Alberni, District of Tofino and District of Ucluelet; Treaty First Nations: Huu-ay-aht First Nation, Yuułu?it̓'ath Government and Uchucklesaht Tribe Government and six electoral areas. The ACRD is within the traditional territory of ten First Nations. Since 2014, the ACRD has contracted Agricultural Support Workers to work with an Agricultural Development Committee towards implementation of the 2011 Alberni Agricultural Plan.

Provincial Meat Inspection Agency

Oversees the construction, regulation, and inspection services of Class 'A' and 'B' facilities.

Island Health

The regional authority responsible for licensing and safety plans for Class 'D' and 'E' facilities.

BC Center for Disease Control

Provides guidelines for the sale of uninspected meat, the safe transport of carcasses, and other food safety concerns.

Licensed Class 'A' and 'B' Facilities

There are 7 class 'A' abattoirs on Vancouver Island. Comments have been solicited by the two primary facilities in the mid-island area. A representative from Gunter Bros Meat Co. in Courtenay reported to have no contention with allowing Class D licenses in the ACRD.

Plecas Meats in South Nanaimo is very understanding of the Alberni producers' plight. At a meeting with producers in spring 2017, Plecas noted that they processed a total of 125 rabbits, 10 beef animals, and 10 hogs for a total of 9 Alberni producers in 2016. The associated revenue from slaughter of these animals would have been approximately \$3000 total. They then offered some concessions for Alberni producers which may have been helpful as interim measures. The concessions appeared to be offered at 'below cost' however, causing concern about financial feasibility and sustainability in the long term. In the end, none of the concessions were followed through with, and producers had the same challenges with transport, availability, and cost as in previous years. Challenges with reduced meat quality due to stress and transport also remained unresolved, and producers continue to have little autonomy over their slaughter arrangements and traditional livelihoods.

BC Association of Abattoirs

The BCAA is the Province's largest related lobby group. It's membership does not currently include any Class D or E license holders. The Association possesses significant industry knowledge and could act as a valuable mentor and support organization for Class D/E license holders should they be included in the BCAA's mandate and network.

District 'A' Farmers' Institute

District 'A' is the umbrella Farmers' Institute organization for Vancouver Island, the Gulf Islands, and the Sunshine Coast. It has been lobbying government directly for expansion of Class 'D' and 'E' licenses since 2013 and is supporting the Alberni bid for regional designation.

Alberni Valley Farmers' Institute

The Alberni Farmers' Institute currently has over 35 members and is the local support organization for Alberni Valley Producers. They have developed a working group for the Class 'D' designation initiatives that includes regional government representation.

Alberni Valley Consumers

Meat from animals slaughtered in a Class 'D' license is only allowed to be sold within the regional district it was produced. The market will be directly driven by consumer demand and desire. In general, *consumer preference for local food appears to be strong, as does concern for animal welfare.* A 'dot

survey' conducted by the Alberni Farmers' Institute on Feb 3 and 4, 2017 had 32 local consumer respondents and helped to illustrate their desires:

- 25 respondents replied that 'local' was one of their top two preferences, with quality coming in second place, and followed by animal welfare.
- 17 indicated that 'locally grown was more important than price' and 9 indicated that they would pay up to 25% more to buy a quality product directly from the farmer

Alberni Valley Producers

This initiative has brought a high level of consensus to a sometimes divided agricultural community. 25 producers responded to the same dot survey noted above as follows:

- All 25 supported the regional lobby to designate the ACRD for on-farm slaughter
- Welfare of animals was their top concern (18), followed by cost and quality of product

Restaurant and Retailers

A number of restaurants were canvased about their willingness to buy uninspected meat from licensed local facilities. The general response was very favourable. Appendix 6 includes letters of support for the ACRD's Request For Designation from high-profile West Coast Restaurants.

9) Requirements for Moving Forward, and Potential Limitations

Alberni Producers recognize that this change to Provincial Meat Inspection Regulations may not happen quickly, nor without some growing pains and collaborative discussion.

Following are some of the steps required for successful transition to a designated region:

- Collaborative discussion with the Provincial Government and BC Abattoir Association. *An academic proposal for this collaborative process is available, as drafted by a Masters' student at Royal Roads University.*
- Host a Slaughter Safe course
- Invite interested producers to draft food safety and operations plans
- Confirm a workable chain of processing from on-farm slaughter to cut and wrap services
- Create a system for tracking industry growth and project outcomes with involvement of both the ACRD and Alberni Farmers' Institute Working Group

There will likely be limitations in any legislative arrangement. As production increases in the Alberni Valley, a need for increase in cut and wrap services will remain. In addition, Class 'D' and 'E' license holders will need to establish safe and workable solutions for transport of carcasses to existing cut and wrap facilities. Another challenge may arise when a Class 'A' facility becomes feasible and is established in the region.

10) Conclusion

Farmers must be empowered to farm, and small and medium sized producers need to be supported to produce food affordably and humanely, for residents within their own regional district. Increasing the options for farm-to-table processing and distribution of meat products will strengthen the region's food system and increase the overall sustainability and resilience of its producers.

The Province of BC's *Strengthening Farming Program* encourages a more prominent role of local government in agricultural policy and planning. With the backing of the information outlined in this report, and the support of the ACRD and many other producers and stakeholders across the province, the producers of the Alberni-Clayoquot Regional District respectfully request that the Province of BC designate the region for Class 'D' and 'E' licenses and commit to working with the government to research the impact of such a project, by tracking and documenting the resultant growth in the industry

11) Relevant Documents and References

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- Shobe, Heather. (2017). *Between life and death: Supporting the needs of Alberni Valley Livestock Producers*. (Master's project proposal). Royal Roads University, Victoria, Canada.
- W. L. Martin, A. Ostry, M. MacDonald. (2010). *Inequities in food safety regulations*. Retrieved from <http://www.uvic.ca/research/groups/cphfri/assets/docs/Inequities%20in%20food%20safety%20regulations.pdf>



Appendix 1: District A Farmers' Institute, Letter of Support

DISTRICT 'A' FARMERS' INSTITUTE

Representing 18 Farmers' Institutes on Vancouver Island, the Gulf Islands
and the Sunshine Coast

February 24, 2017

To: The Members of the Alberni Farmers' Institute.
Re: D and E Licensing Pilot Project

Dear AFI Members,

At the recent District 'A' AGM held on January 29, 2017 at Nanoose Place, we heard your delegate Lisa Aylard, speak of your decision to investigate the regulations governing D and E licensing in B.C.

Your proposal that a Pilot Project be conducted in the ACRD (Alberni Valley) to review the regional limitations placed on D and E licenses, seems, to us, a sound one.

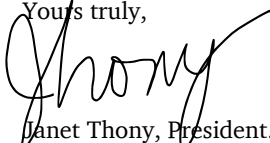
Your initial work done in fact finding, surveying farmers, drafting your position and request, and enlisting the help of Scott Fraser to deliver your message to the Legislature proves you have the ability to carry through with your proposal.

District 'A' members and delegates agreed at the meeting that your proposal speaks to a problem that has been endemic in protein production agriculture since 2004. District 'A' Advisory Board has taken this issue to the Ministry of Agriculture for the last two years at our annual June meetings. We will do so again this year.

Please consider this letter of support an assurance that all aspects of your project will be supported.

Do not hesitate to call on us at any time you feel we may be of assistance.

Yours truly,



Janet Thony, President.

On behalf of District 'A' F.I. Delegates and Members

District 'A' Farmers' Institute c/o Janet Thony, 267 Buller Road, Qualicum Beach, B.C. V9K 2B3

Appendix 2: Stone Haven Farm, Interest in Class ‘D’ License

April 6, 2017

Attention Heather Shobe,
Agricultural Support Worker
Alberni Clayoquot Regional District.

We, Jamie and Lisa Aylard, owners of Piglet’s Pigtale Farm Ltd (Stonehaven Farm) are interested in acquiring a Class D license for the purpose of on farm slaughter. We feel that the 2004 changes to regulations to on farm slaughter have negatively impacted our ability to make the farm business profitable. A Class D License would also limit the amount of stress on animals affecting the quality of our products. We fully support that the Alberni Clayoquot Regional District to be given classification for D and E licensing.

Thanks

Jamie and Lisa Aylard
Piglet’s Pigtale Farm Ltd
Stonehaven Farm

Appendix 3: Highway 4 Study Excerpt

“3. EXISTING CONDITIONS – HIGHWAY 4 (FROM THE STUDY)

3.1 Roadway Geometry

Highway 4 from the Whiskey Creek Store to the Mount Arrowsmith/Loon Lake intersection is a very windy road. There are eight curves with slow advisories of 60km/h, four with slow to 50 km/h advisories, and four curve signs with no suggested speed reductions. This is problematic for the many large trucks and recreational vehicles that travel the route as they sometimes travel at below the advisory speeds to negotiate the windy road. This causes queuing and frustrations to drivers as there are very limited opportunities to pass. As we will see further in the report, the accident rate through this section is quite high, and the accidents cause significant delays.

3.2 Travel Speed

The existing highway is posted at 80 km/h. The distance from Highway 19 to the Loon Lake Intersection is 31.3 kilometres and the travel time is 25 minutes. This results in an average travel speed of 75 kilometres per hour. The average travel speed is about 5kilometres/hour less than the posted speed, and during the heavy tourist season it is often much lower than that due to motorists traveling below the posted speed. Some of the factors that tend to reduce the traffic speed are listed below:

- Tourists parked at the east end of Cameron Lake. On a typical summer day, traffic is often parked on both shoulders, which tends to narrow the driving lanes. Also pedestrians cross the highway to gain access to the beach. This slows traffic and creates a safety problem.*
- Windy road and speed advisories.*
- Congestion at Cathedral Grove. The traffic speed has been reduced to km/h for a short section of Cathedral Grove in order to calm traffic and make it safer for park users. Traffic is often stopped through the Grove on busy summer days to allow for recreational vehicles to back out into the flow of traffic and to allow pedestrians to cross the highway.*
- Steep grade on the east side of The Hump. Loaded trucks are traveling at sometimes less than 30km/hr by the time they reach the truck-climbing lane. This has a tendency to have traffic queue up behind the truck. Often, other trucks attempt to pass a loaded truck once it moves into the slow lane. This renders the passing lane unusable for other vehicles. For traffic heading eastbound going down The Hump, there is no crawl lane for heavy trucks, which must travel very slowly to negotiate the sharp turns. This causes delays for the traffic following them. Poor horizontal road alignment prevents truckers from maintaining their speed as they travel up the east side of The Hump, which also impedes the flow of traffic.*

3.3 Road Reliability

Highway 4 is the only route into the Alberni Valley and all West Coast communities. It is an essential link to the West Coast. During the fall and winter of 2006-07, it was closed on many occasions, for periods of up to two days, due to motor vehicle accidents or weather events. These closures have on average lasted for periods of about two hours. This has a major impact on the following:

- The economy of the West Coast*
- People trying to catch ferries, airplanes, or keep other appointments*
- Emergency transportation, such as police and ambulance*
- Sick or injured persons who are prevented from getting to the Regional Hospital in Nanaimo*
- Commercial traffic, resulting in increased costs to trucking companies and consumers.*

In the analysis done by Mr. Peter Lyall, some of the 2007 closures are listed with the cost impact of these closures noted. It is clear from his report that the delay rate of 97.6 hours/100km/year was quite high in comparison to other highways such as the Sea to Sky, which incurred delays of 72 hours/100km/year.

3.4 Accident Rates

The TAC Geometric Design Guide for Canadian Roads states in Section 2.1.2.7 “curve collision frequency increases with the decrease in radius of a curve”. The curvy nature and narrow shoulders of Highway 4 make driving this road very challenging. The accident rate for Highway 4

between the Loon Lake Intersection and the Qualicum Interchange is 0.64 accidents/million vehicle kilometres. This is above the provincial average of 0.5 for a two lane arterial highway. Further in this report the accident history is documented.

3.5 Cathedral Grove

Cathedral Grove is a unique provincial park that has many large Douglas fir trees adjacent to the highway. These trees are very old and have limbs or root masses that are subject to rot. In the violent windstorms that occur quite regularly, limbs often fall from trees, and on occasion, entire trees fall to the ground. The safety and reliability issues this creates are difficult to manage, as there is much resistance to removing any trees from this area.

In addition, due to the popularity of the park, there is not enough parking for the large numbers of tourists, who routinely park on the shoulders, outside the designated parking area, further narrowing the roadway. Pedestrians crossing the highway present a major hazard, especially during the heavy traffic volume of the summer months. Drivers of recreational vehicles that park at the rest area cannot see when backing out. Quite often, a passenger will walk into the middle of the highway to stop oncoming vehicles in order to allow their RV to back into the traffic lane. This too is a very unsafe act, but is done regularly by persons unskilled in traffic control.

The Ministry of Transportation and Parks tried to gain support for the construction of a parking area further west on Highway 4, to allow for park visitors to park off the roadway. Friends of Cathedral Grove protested this, and the parking area was never constructed.

Instead, the Ministry tried to make the existing parking area safer by reducing the speed and installing traffic calming signage. This has reduced the risk and severity of accidents, but it does not address all the safety concerns. Diverting the majority of the traffic through a new Horne Lake Connector would make the area safer by reducing the amount of vehicle traffic at this location.

3.6 Passing Opportunities

Highway 4 between the Qualicum Interchange and the summit of The Hump has very limited opportunities to pass. As a result long queues develop behind vehicles that travel below the posted speed. The limited passing opportunities are at times not usable due to traffic occupying the opposing lane. With the long queuing of traffic, the two truck climbing lanes are sometimes not effective as the queue is too long to get any sort of separation. From Cameron Lake through Cathedral Grove, the road is very windy, with no passing opportunities, which creates driver frustration. It would be very difficult to construct passing lanes along Cameron Lake, as the corridor is narrow, with lake on one side and steep side hill on the other. There is a massive rock formation at Angel Rock, which makes it very difficult and expensive to make any improvements. Through Cathedral Grove it is not possible to build passing opportunities without the removal of a large number of the massive trees."

Source: R F Binnie and Associates Ltd. (2008).

Appendix 4: Petition, Signatures Solicited Feb. 3 & 4th, 2017

Petition

The Government of BC has recognized the need for greater food sustainability within communities. The Alberni Farmers' Institute, want the government to allow Class D And E Slaughter Licences to be designated to the Alberni Clayoquot Regional District. This would be a great support for local sustainable agriculture, lowering the carbon imprint and being mindful of animal welfare.

We the undersigned support this initiative.

NAME	ADDRESS	PHONE NUMBER	SIGNATURE
LISA AYILARI	8600 Blk Sand Rd	250-720-1327	[Signature]
MAUR KUPA	7275 BRUCE CREEK RD	250-650-7737	[Signature]
Alan Wilson	3770 Sam Mako Dr.	778-421-2562	[Signature]
Tawney Lem	4850 Benjamin	250-723-0708	[Signature]
JAMES WRIGHT	2728 - 7 th Ave	250-723-5726	[Signature]
MARGE EMBLEM	4116 10 th AVE	250-724-1448	[Signature]
PETER RUESCHMANN	3615 6 th AVE P.A	250-723-2467	[Signature]
PAT RUESCHMANN	3 rd Ave	250-723-2467	[Signature]
Dan Sheenan	8973 Marlowe Rd.	724-0527	[Signature]
T. Shannon	8546 Beaver Creek Rd.	720-0340	[Signature]
John Sheenan	8975 Beaver Creek Rd.	723-8767	[Signature]
Edna Cox	4727 Pemberton Road	723-8362	[Signature]
Janis Nairne	5715 Gordon Ave.	723-3350	[Signature]
Carol Schmitt	PO Box 9 Port Alberni BC	731-5043	[Signature]
TERRY NETECCI	3579 McKnight St. P.4.	720-9633	[Signature]
JOE AMOURBIAUX	8681 FABER RD.	723-3001	[Signature]
Shirley Mulder	1049 McDiellene Dr Parkside	250-240-7890	[Signature]
JOSIAH GADSBY	4561 BATTY	250-201-7484	[Signature]
FRAN PHUYM	5267 Gordon ave.	250-723-2378	[Signature]
LORETTA PARKINSON	4474-8 th AVE	250-723-2562	[Signature]
Christine Milligan	6483 Beaver Creek Rd.	250-720-9168	[Signature]
Christine Hodges	3678 Grove Rd	250-731-5140	[Signature]
Pamela Wilson	5199 Pineo Rd	723-988-5244	[Signature]
Chris Samuels	6144 Brindley Way Rd	250-715-4170	[Signature]
Adrienne Oostrom	9530 Somers Rd	250-618-2976	[Signature]
Sally Hill	6144 Drinkwater	250-723-0754	[Signature]
Marlene Lobb	6678 Desmond Rd	250-644-4604	[Signature]
Bernice LeMay	10482 West Coast Rd, Shorkey	250-896-4491	[Signature]

Petition

The Government of BC has recognized the need for greater food sustainability within communities. The Alberni Farmers' Institute, want the government to allow Class D And E Slaughter Licences to be designated to the Alberni Clayoquot Regional District. This would be a great support for local sustainable agriculture, lowering the carbon imprint and being mindful of animal welfare.

We the undersigned support this initiative.

[illegible]

Appendix 5: Example of Wait Times for Slaughter

(57) Gunter Bros Meat Co Ltd

facebook.com/GunterBrosMeat/?hc_ref=PAGES_TIMELINE&ref=...

Gunter Bros Meat Co Ltd

Home About Photos Reviews Likes Videos Events Posts Create a Page

GUNTER Bros. Meat Co. Ltd.
Retail - Wholesale
Custom Processing
334-2960

Gunter Bros Meat Co Ltd
@GunterBrosMeat

Like · Reply · September 7, 2016 at 1:15pm
View more replies
Write a comment...

Gunter Bros Meat Co Ltd
August 24, 2016 ·

Attention Livestock Producers!!!!!!
If you are needing slaughter services,
Please call AS SOON AS POSSIBLE
to reserve your time.
This year is busier than normal.
Our next available spaces start in November.

Like · Comment · Share

13 · 3 shares

Robyn Disco · Like · Reply · August 24, 2016 at 5:05pm
I booked a few months ago!

Emma Harries · Like · Reply · August 26, 2016 at 8:31pm
What animals do you process? Poultry?

Gunter Bros Meat Co Ltd · Like · Reply · August 26, 2016 at 8:35pm
We can package and cut them after they have been slaughtered and cleaned. We handle need, poem, lambs and goats and bison from beginning to end

Chronological

1 Comment
Like · Comment

Shawna Earl Webber
April 13, 2016 at 9:48am
I came down yesterday and got a pack of Fast fry beef steaks, they w... See More

Like · Comment

PEOPLE ALSO LIKE

Signature Oil & Vinegar
Specialty Grocery Store

Seaview Game Farm
Grocery Store

Amara Farm
Farm

Food & Grocery in Courtenay, British Columbia

Call Now

Message

Get Messenger on Your Phone
Keep up with friends wherever you are. Get a link to install the app.
Send to My Phone

Sondra McDonald · B...
Leigh-Anne Botting
Brooklyn Enns
Kris Lloyd
Kat Deer Fern Belisle
Eric Feehely
Wendy Brown
Karen Pfeifer
MORE CONTACTS (3)

Search

Appendix 6: Letters of Support from Coastal Restaurants



To Whom it May Concern,

I support the Alberni Farmers' Institute's request to the Province of BC for designation under the Meat Inspection Regulations. This designation would allow producers to apply for Class D licenses and allow for slaughter of red meat animals on-farm and sale to restaurants and retail outfits within the Regional District.

I understand that these new Class D slaughter facilities would be fully licensed and that monitoring would be conducted by Island Health, but that individual carcasses would not be inspected.

I look forward to growth in the local livestock industry and the opportunity to purchase red meat directly from producers.

Sincerely,

Name	Organization	Signature
Bobby Lax	TuLB	Bobby Lax
Tina Windsor	PICNIC CHARCUTERIE	Tina Windsor
Jack Wozniak	WOLF IN THE FOD	Jack Wozniak
Lisa Ahier	SOBU	Lisa Ahier
Ian Riddick	Long Beach Lodge & Restaurant	Ian Riddick



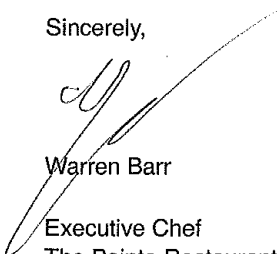
To Whom it May Concern,

I support the Alberni Farmers' Institute's request to the Province of BC for designation under the Meat Inspection Regulations. This designation would allow producers to apply for Class D licenses and allow for slaughter of red meat animals on-farm and sale to restaurants and retail outfits within the Regional District.

I understand that these new Class D slaughter facilities would be fully licensed and that monitoring would be conducted by Island Health, but that individual carcasses would not be inspected.

I look forward to growth in the local livestock industry and the opportunity to purchase red meat directly from producers.

Sincerely,



Warren Barr

Executive Chef
The Pointe Restaurant at the Wickaninnish Inn

500 Osprey Lane
Tofino BC
V0R2Z0
250-725-3100

Appendix 7: Letter of Interest, North Island College



November 1, 2017

Heather Shobe and Anna Lewis
Alberni-Clayoquot Regional District
Agricultural Support Workers
6220 Karen Place
Port Alberni, BC
V9Y 8K9

Dear Ms. Shobe and Ms. Lewis,

North Island College is pleased to learn of the advancement of discussions specific to the viability of a regional-based Meat Processing Educational Program. Advanced education and skills training, followed by the expansion of regional-based services and production, are integral to sustained regional and Island wide economic development.

Over the years, North Island College has assessed the overall viability of such programming and are interest in working with regional stakeholders to advance related discussions. Such programming would require access to programming resources, adequate equipment and storage facilities, to which North Island College can help inform.

We look forward to discussing regional needs, interests and priorities.

A handwritten signature in black ink, appearing to read "Cheryl O'Connell".

Sincerely,

Cheryl O'Connell
Dean, Faculty of Trades and Technical Programs