

No Brainer: Mad Sheep, Crazy Women and Blinded Bureaucrats

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In October 2003, the Ministry of Health Planning Protection and the BC Centre for Disease Control introduced new meat inspection regulations under the Food Safety Act, to govern the processing of animals for food in British Columbia. The new regulations came into effect on September 01, 2004. Abattoirs and meat processing facilities will have a two-year transition period to implement changes to adopt the new Food Safety Act regulations. It will be mandatory by September 01, 2006 to have all animals for food production processed within a provincially approved and licensed facility. Currently, inspected and approved abattoir facilities do not exist on the Gulf Islands. Much of the meat produced on the Gulf Islands is sold through direct farm markets and these markets are important to local economies and tourism. It could result in the loss of important local island products such as Salt Spring Island lamb. [Extract from Nov. 2004 grant application by Salt Spring Farmers' Institute for government funding to help them save their world famous local lamb industry.]

Although the new meat regulations were often presented in the media as a health and food safety initiative, the local BC public consultation process and other coinciding events reveal that the new initiative is as much about the BSE crisis, the live cattle US export trade, and consolidating and expanding a Canadian meat processing industry to compete internationally. This understanding emerged from the local farmer-ministry-industry consultation meetings I attended. When questioned by local farmers at one of the initial meetings, Ministry of Health and Min. of Ag spokespersons could not cite a single death in the Province attributable to uninspected beef or lamb in the last 10 years, and when contacted, the Ministries could provide no data on reported cases of food related illnesses from local uninspected meat. The new meat regulations initiative appeared to gain its urgency from the closing of the US border to Canadian live cattle and beef after the tracing of a single case of BSE to an Alberta farm in (date). Ministry spokespersons at public consultation sessions made it clear that BC's Provincial Government wanted to introduce a single set of standards for all the slaughter and processing of all animals to be used for food in BC. In most cases, pre- and post-mortem (check if both) inspections would be carried out not by Provincial inspectors but by Federal inspectors, thus easing the way for the introduction of one set of Federal standards nation wide - which in turn would be harmonized with USDA standards. In this sense, the BC Food-Safety initiative was to be part of series of government regulatory moves that would, a) forced all future meat processing into facilities that required considerable capital investment and would thus concentrate the Canadian industry and would also b) further integrate US and Canadian agricultural and food processing industries to create a single homogenized market for industrially produced food.

On the one hand, the move to mandate new Canadian Federal meat regulations that

are harmonized with USDA standards can be seen as a reasonable strategy to address the live cattle industry crisis in Alberta due to the closing of the border – by developing Canadian indigenous industrial meat processing facilities that are competitive with those in US. On the other hand, the BC farmers most adversely affected by the new BC regulations are small scale farmers, very often women farmers and organic farmers, who sell their locally processed lamb to local customers at farm gate. Meeting the new regulations would force these small scale farmers into using industrial slaughtering facilities that are neither geographically available nor ethically acceptable. Even if they were available, being forced into dependency on an industrial processing system undermines the economic advantages of selling locally, as large plants will not want to do custom cut and wrap or deal with a lot of small individual customers. The double irony of the new regulatory efforts to deal with the meat export and BSE crisis is that the lamb processed at local uninspected facilities will neither enter the commercial nor export markets and thus will never occasion the US border to be closed, and, of course, sheep do not get BSE. Nor typically do organically raised cattle.

Drawing heavily on narrative accounts of the efforts of 3 women farmers to save their small scale farms and their livestock, this paper will use the case study of the new BC meat regulations to examine the role of the BC government in creating institutional barriers to local efforts to develop organic and locally oriented sustainable agriculture on Southern Vancouver Island.

Introduction

Many of us are interested in developing alternative food systems (AFS) whether for ethical, environmental or social justice issues – all three reasons usually involve some degree of localization of food systems and support for and protection for small scale farming and food processing.

In October 2003, the Ministry of Health Planning Protection and the BC Centre for Disease Control introduced new meat inspection regulations under the Food Safety Act, to govern the processing of animals for food in British Columbia. The new regulations came into effect on September 01, 2004. Abattoirs and meat processing facilities will have a two-year transition period to implement changes to adopt the new Food Safety Act regulations. It will be mandatory by September 01, 2006 to have all animals for food production processed within a provincially approved and licensed facility.

Like most of the small farmers where I live on the Gulf Islands in BC, I sell my lamb, cut and wrapped to neighbours, visitors, and other direct customs. Most lamb raised in BC (64%) is sold this way - being custom slaughtered and cut and wrapped in facilities that may be governed by local health authorities but not inspected by the Ministry of Agriculture (Provincial) or Federal inspectors. So we have long had part of an AFS here - an AFS that is about to be closed down by food safety legislation. Some women farmer friends and I (Barb Grimmer and Ellen Willingham) on the island where I live are trying to stop the government from closing us down as livestock farmers. They have asked me

to get any advice, information, ideas I can when I come here. Barb has become an expert in the construction of abattoirs and meat cutting facilities and is planning to go to the San Juan's to look at a mobile abattoir in the spring and Ellen (who is also an Anglican minister and certified organic farmer) is President of our Farmers' Institute. We are working with others on and off the island and in many places in BC there are groups and individuals trying to resist. But food safety legislation is a pretty powerful force. So are the NAFTA, the reality of a single integrated meat market for North American, the feedlots in Alberta, the closing of the US border, BSE. The point about this is that when Barb, Ellen and I farmed within our AFS we were able to escape some of these overwhelming forces. Now, in the name of safety, our government has made us very vulnerable to political and economic forces over which we have no control. We think our food system is safer than the industrial system the Ministry wants to impose on us. We think it is ethically and ecologically better. But we three farmers can no longer keep the lambs born on our farms out of the industrial meat system - an outcome that violates our ethical and organic standards – not to mention making our farming non economically viable. We are pretty mad about all this.

Most of us in this room are aware that historically the regulatory environment in Canada has worked to “encourage” the development of industrial and large scale monocrop or mono-function farming and centralized food systems and to make small scale farming very difficult and economically non-viable - albeit artificially so if we were to remove subsidies and do full social and environmental accounting. The social, environmental and health costs of the pesticide, herbicide and fertilizer dependent, energy intensive, globalized and long distance food system with its concentration of economic power and control are well known to most people here – but not to most consumers. It did provide what appeared to be a plentiful supply of cheap food to Canadians. The BSE crisis and the Avian flu outbreak risk leading to the crisis of confidence in the industrial food system that was witnessed in the UK and EU over the last few years. So even if governments were historically aware of problems in the food system, these recent events are forcing them to be seen to be doing something - even if their responses are unrelated to the real problems.

Thus we are hearing governments talk about environmentally sustainable agriculture, and safe, quality food - not just cheap food. If historically the centralized industrial system delivered cheap food, there is a lot of evidence that localized, small scale, ecological farming is central to delivering the health, environmental, food quality and other social benefits that are increasingly seen as equally important ‘agricultural products’. The Capital Region District Health Authority (Victoria) BC has defined food security, and the promotion of local and healthy food and support for local small scale farming to be part of its vision of health. There is a real irony therefore that, despite all the policy statement good intentions, recent legislation around meat and food safety in BC is going to extend and more deeply consolidate the industrial meat production system that has brought so many problems and will effectively legislate an end to the growing local alternative food system for meat – including organic meat - and put many small livestock farmers out of business. After food safety crises in the UK, The UK Parliamentary Report “Safer Eating - Microbial Food Poisoning and its Prevention” (1997) reported that the “EU

promulgated measures have, along with market forces, reduced the number of slaughter houses in the UK from 1385 to 384 today. **From the viewpoint of food safety, the effect of such regulations is very likely to have been the opposite of that intended.**" (In Lyle, 2004, p2.). Doesn't all this seem irrational?

Under the Canadian Constitution Act, the Federal and Provincial Governments each have legislative powers to do with food, whether safety, quality and trade. Both can legislate on issues of food safety and public health. The Federal government has legal powers regarding inter-provincial and international trade and quality standards, and the provinces make laws regarding local (intra-provincial) trade and quality standards. According to Fisher and Evans (2002), the big difference between federal and provincial inspection is size not safety - the former are usually bigger plants.

With the new meat regulations in Food Safety Act, current Provincial standards have been upgraded to better harmonize with Federal standards and more generally with USDA standards as part of the move towards a single, barrier free North American market in meat. The new regulations will typically require significant capital investment but will also require pre and post mortem veterinary inspection, requirements that will make small scale processing facilities operating one or two days a week and processing small numbers of animals no longer economically viable. The introduction of similar regulations in Ontario in 2001 led to the loss of small scale licensed abattoirs as operators chose to leave the business rather than try to keep up with the cost of new food safety regulations (Fisher and Evans, 2002). Given that much of BC meat has been processed in facilities governed by local health standards rather than Provincial license, the loss of abattoir capacity can be expected to be even greater in BC.

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all the slaughter and processing of all animals to be used for food in BC. In most cases, pre- and post-mortem (check if both) inspections would be carried out not by Provincial inspectors but by Federal inspectors, thus easing the way for the introduction of one set of Federal standards nation wide - which in turn would be harmonized with USDA standards. In this sense, the BC Food-Safety initiative was to be part of series of government regulatory moves that would, a) forced all future meat processing into facilities that required considerable capital investment and would thus concentrate the BC and Canadian meat industry and would also b) further integrate US and Canadian agricultural and food processing industries to create a single homogenized market for industrially produced food.

On the one hand, the move to mandate new Canadian Federal meat regulations that are harmonized with USDA standards can be seen as a reasonable strategy to address the live cattle industry crisis in Alberta due to the closing of the border – by developing Canadian indigenous industrial meat processing facilities that are competitive with those in US. On the other hand, the BC farmers most adversely affected by the new BC regulations are small-scale farmers, very often women farmers and organic farmers, who sell there locally processed lamb to local customers at farm gate. Meeting the new regulations would force these small scale farmers into using industrial slaughtering facilities that are neither geographically available nor ethically acceptable. Even if they were available, being forced into dependency on an industrial processing system undermines the economic advantages of selling locally, as large plants will not want to do custom cut and wrap or deal with a lot of small individual customers. The triple irony of the new regulatory efforts to deal with the meat export and BSE crisis is that the lamb processed at local uninspected facilities will neither enter the commercial nor export markets and thus will never occasion the US border to be closed, and, of course, sheep do not get BSE. Nor typically do organically raised cattle.

For this part of the story I will shift my standpoint to that of a sheep farmer who, like most BC farmers, direct markets her lamb at the farm gate.

If you are a small-scale farmer producing lamb for your local market 2 new problems face you. First, you can no longer sell farm gate unless you use a licensed and inspected facility. There is only 1 inspected and approved abattoir facility near Victoria – and although convenient to farmers near Victoria, it is still over 2 hours and a ferry ride from the Gulf Islands - home of the famous Gulf Island and Salt Spring Lamb. There are 2 others further north on Vancouver Island. The 2nd new problem is that the only accessible licensed facility may not stay in business when the owner learns how much it will cost to upgrade. Data from the Ontario experience suggests it will be too expensive for many operators to upgrade - more expensive than even they expect (Fisher and Evans, 2002). Currently, no inspected and approved abattoir facilities exist on the Gulf Islands – and although these great new meat regulations standards would allow us to export into the US – we could never afford to build or operate such a facility – and we don't export our lamb outside our local region.

And the new requirements would require a vet to spend most of a day traveling to and from the islands (or remoter BC regions) to supervise the slaughter of a small number of animals, a prospect that is prohibitively costly in both time and money. Transporting animals off island (or long distance to slaughter) is difficult, expensive and stressful to the animals - and raises logistic problems of coordinating with custom cut and wrap facilities. For we are not only talking about new slaughter facilities - but we farmers can be sure that with them will soon come new regulations about custom and wrapping facilities. In the week before Christmas 2004 one of the only 2 inspected custom and wrap facilities closed its doors unexpectedly after 40 years in business and told me that the Health Inspectors were imposing unreasonable expectation over a short period of time and that the cost of upgrading made his family business un-viable economically.

Neo-conservative governments as agents of monopolies

Buried in this story is a story of how neo-liberal governments who espouse minimal government interference and advance the cause of competition actually function to accomplish the opposite. Here is what is going to happen to Ellen, Barb and myself.

1. Investors have told the BC government that they refuse to invest while there are so many small-scale plants operating. They say the small-scale plants have an unfair competitive advantage because they don't have to make the capital investment to meet federal and provincial standards (which are expensive). Ministry officials have repeatedly cited this reason for the new standards at several meetings with farmers. The Ministry helpfully closes down all the competition so the big investor will get 100% of the livestock to be processed – making it safe to invest. They cannot do this using economic measures – because small-scale plants are economically efficient and better adapted to their local niches. They really are more 'competitive' than big plants. But they can close them using non-economic measures – food safety legislation. The ministry doesn't see it this way. They are protecting our health - even if local food is not making us sick.
2. Government Food Safety legislation forces small-scale plants to close. (Ontario evidence shows that the cost of upgrading is proportionally higher for small-scale plants.)
3. Investors invest in a single plant/abattoir for the whole of Vancouver Island.
4. Many farmers now find they have to travel too far with their animals - and travel again to pick them up after cutting and wrapping. So they sell to the processor. The processors offer them half of what they would have gotten through farm gate sales – but the farmer has no alternative, so she sells. What else can she do? There is no other plant - now there is no competition and it is illegal for her to sell her meat farm gate unless she uses this plant. This way the plant makes the profit they would have made for processing and the profit the farmer would have made if she could have sold it directly.
5. Barb goes with her lamb and the new plant says they will change more for doing custom processing. Because they are now getting so much lamb at a low price from farmers in more remote places they don't need Barb's business. So they tell her 'take it

or leave it'. Barb also suspects that the facility won't give her back her own lamb when it is processed – they are so big now, how could they keep track of individual lambs like the small scale plants used to do? And why would they want to?

6. I go with my lamb. They will make \$50.00 for slaughtering and custom cutting and wrapping my lamb for me to sell farm gate. But they will make \$100 if they buy my lamb and process it and sell it as local lamb themselves or to a supermarket. They refuse to process my lamb. The government has made all the alternatives (competition) illegal. They will buy my lamb for \$100. I could sell it for \$225 custom cut and wrapped at my farm gate. But they won't process it. I have to sell them my lamb. I have to either become a supplier of cheap raw produce for the monopoly industrial meat plant or I get out of farming.

7. Ellen, the Anglican minister, conducts a burial service for small-scale livestock producers on Pender Island. We all become vegetarian - which we kind of think is a good thing anyway - especially under the circumstances.