



## **ALBERTA BEEF PRODUCERS RECOMMENDED CHANGES TO THE MEAT INSPECTION REGULATIONS AND THE ABILITY TO SELL MEAT FROM LIVESTOCK SLAUGHTERED ON THE FARM**

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### **BACKGROUND:**

Alberta beef producers work very hard to follow best management practices in animal welfare and ensuring their livestock is well cared for and healthy. Unfortunately, even under the some of the best animal husbandry practices in the world, cattle do accidentally get injured on the farm and need to be euthanized to mitigate any suffering. In almost all cases it is more humane to euthanize these animals rather than transport them to a processing facility which would prolong the animal's pain. The meat from these animals in most cases is still safe for human consumption, and many livestock owners will try to salvage the meat for their own consumption because they don't want the meat to be unnecessarily wasted. Consumption of this meat by the owner and the owner's family is allowed under the current Alberta legislation.

However, there is only so much meat a farm family can use, and there are not adequate options for salvaging this extra meat from the farm, which results in a waste of perfectly good food. More specifically, there are not clear mechanisms in place to sell or donate meat from any livestock slaughtered on the farm that has not had an ante-mortem inspection by a veterinarian. An unintended consequence of this is that some of these compromised or injured animals are transported when they shouldn't be, or the meat cannot be used. Furthermore, there is increased interest in reducing any animal stress caused by transporting to a slaughter facility, where on farm slaughter on pasture in the animal's natural or comfortable environment can help reduce that stress.

### **BENEFITS:**

Improvements to Alberta's Meat Inspection Act and Regulations **regarding ante-mortem inspection** could have significant positive impacts to animal welfare in terms of reducing suffering for injured animals or providing for stress-free and humane slaughter of an animal in its comfortable environment. It also provides a viable option to not transport compromised animals to a slaughter facility or auction market.

Food waste is a major contributor to a commodity's environmental footprint, and reducing food waste reduces impacts to the environment while providing additional sources of nutrients to those in need. The National Beef Sustainability Assessment found that reducing meat waste by 50% could avoid the release of 1.6 Mt CO<sub>2</sub> eq/ year in Canada (source: [https://crsb.ca/assets/Uploads/About-Us/Our-Work/NBSA/Infographics/Infographics-High-res/154c61c4f8/crsb\\_meat\\_waste\\_v6.1.pdf](https://crsb.ca/assets/Uploads/About-Us/Our-Work/NBSA/Infographics/Infographics-High-res/154c61c4f8/crsb_meat_waste_v6.1.pdf)) Allowing producers to sell or donate meat from animals killed on the farm helps to reduce food waste, while contributing valuable nutrients to society.



## CURRENT ALBERTA LEGISLATION:

Under the *Alberta Meat Inspection Act (2010)*, a producer can sell, transport or deliver meat to any person who is not a member of your immediate household only if all the following criteria are met (Alberta Agriculture and Rural Development, 2014):

- The animal (ante-mortem) must be inspected by an appointed inspector
- Inspection must take place both before and after slaughter
- Slaughter must take place at an abattoir
- The carcass must be found to be fit for consumption

The Act also allows for a mobile butcher to slaughter on farm, however this meat cannot be sold or donated because mobile butchers are currently not certified for ante-mortem or post-mortem inspection. (Alberta Agriculture and Rural Development, 2014).

*Inspected Meat and Emergency Slaughter* (Source: <https://www.albertabeef.org/producers/cattle-practices> )

To qualify as “Inspected Meat,” an appointed meat inspector (usually an appointed veterinarian) must perform an ante-mortem inspection of the animal prior to emergency slaughter (humane stunning and bleeding) at the farm or feedlot. The carcass must then be transported, in a manner that protects it from contamination or spoilage, to a Provincially Licensed Abattoir for evisceration and further processing. The carcass must be delivered to the abattoir within two hours of slaughter and receive a post-mortem (PM) inspection. The PM inspection can be done by either the appointed inspector or by a Meat Inspection Branch Inspector. Once approved, the product is stamped as inspected and is then legal to sell. Note that the appropriate forms must be completed by the appointed inspector on farm or feedlot and these forms will need to accompany the carcass to the licensed facility. Professional fees to engage an appointed inspector are at the discretion of the provider. **NOTE:** It is possible that another person, such as a mobile butcher could be appointed as an inspector under the Act.

The *Alberta Meat Inspection Regulation (2009) S43 Emergency powers outside a meat facility* states:

**43** Where an inspector is outside a meat facility and there is an emergency situation which, if the same circumstances existed in a meat facility, would be such as to empower the inspector to adopt certain measures under other provisions in the Regulation, the inspector may exercise those powers as if in a meat facility.

Essentially, this regulation allows for an inspector to do an ante-mortem inspection at a farm if needed, and where the meat could still be salvaged for sale or donation if further processed at a licenced meat facility. Unfortunately, it is currently too costly to pay for a veterinarian to come to the farm, and in many cases unnecessarily prolongs suffering if the animal is injured.

*Selling Meat from the Farm Gate:*

Generally, for healthy uncompromised animals, you can sell your animals for meat if you transport them to a licensed provincial or federal processor. If it is **inspected** (both ante and post mortem), processed, and packaged you can store the meat on farm and can legally sell at a farmers’ markets **only**, and you do



not require a handling permit from Alberta Health Services. If you intend to sell your **inspected** meat at the farm gate, in public markets, to restaurants and institutions, or online, you require a food handling permit for the storage and transport of the meat to your customers. (Alberta Agriculture and Rural Development, 2014). Currently it is illegal to sell or donate uninspected meat at the farm gate.

#### *Wild Game Donations to Food Banks*

Under the *Wildlife Act* wild game cannot be sold. However, meat that is intended to be used by the hunter and the hunter's immediate family can be processed at a licensed meat facility.

Moose, elk and deer can be donated for human consumption through the *Alberta Hunters Sharing the Harvest* program and participating food banks. The program is monitored by Alberta Health Services, and meat has to be processed in a licensed facility and follow processing and inspection regulations (except for ante-mortem inspection). Processing costs are covered by sponsorship.

<https://www.edmontonsfoodbank.com/about/programs/alberta-hunters-sharing-harvest/>

### **THE ALBERTA MEAT INSPECTION ACT AND REGULATIONS:**

#### *Meat Inspection Act (2010)*

##### **Inspectors**

**2(1)** The director may appoint veterinarians registered under the Veterinary Profession Act and other persons as inspectors.

##### **Slaughter of animals**

**4(1)** Except as provided in the regulations, no person shall slaughter an animal unless the animal has been inspected by an inspector immediately before the time of slaughter.

(2) Subsection (1) does not apply to a mobile butcher who slaughters or assists in the slaughter of animals the meat from which is to be consumed by the producer of the animal or by the members of the producer's immediate household.

##### **Sale of meat**

**5** Except as provided in the regulations, no person shall sell, offer for sale, transport or deliver meat to any person unless

- (a) the animal from which the meat was obtained was inspected by an inspector under section 4,
- (b) the slaughter of the animal took place at an abattoir or at an establishment<sup>1</sup>,
- (c) there was a post-mortem inspection of the carcass of the animal from which the meat was obtained conducted by an inspector immediately after the slaughter of the animal, and
- (d) the meat is judged by an inspector to be fit for human consumption and has an inspection legend applied to it.

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<sup>1</sup> "establishment" means any place in which animals are slaughtered or meat products are prepared, packaged, labelled or stored (Meat Inspection Act, Canada, RSC 1985, c 25 (1st Supp))



## POSSIBLE SOLUTIONS:

We believe that meat can be safely donated or sold from a healthy or non-diseased injured animal that has been slaughtered on the farm provided food safety, animal welfare, and risk management standards are maintained. It seems that the primary reason that inhibits this from happening in legislation is **ante-mortem inspection by an appointed inspector**.

Some possible solutions that we have identified are:

- **Allow for the use of photographs and videos as a means of ante-mortem on-farm inspection by a veterinarian or vet technician to reduce ante-mortem inspection fees.** The veterinarian still would have the ability to not approve if they felt the animal was diseased or compromised, the photos/video were not clear, or other reasons.
- **Allow for mobile butchers or other individuals to be trained and appointed as licensed ante-mortem inspectors under the Meat Inspection Regulations provided:**
  - All other regulations for post-mortem inspection and food safety are followed
  - Proper training/mentorship program is developed to become a certified ante-mortem inspector in identification of animal diseases, reporting protocols, and paperwork
  - Appropriate risk management safeguards (liability insurance, penalties) are in place
- **Create a program and/or guidelines to allow for a livestock owner the ability to donate meat to a food bank or other charitable organization, from an animal that has been slaughtered on-farm**
- **Amend the Meat Inspection Act and Regulations to allow for any animals (not just emergency slaughter) that have ante-mortem inspection under recommended changes above, can be slaughtered on farm, and the carcasses transported to a licensed meat processing facility to be sold or donated for human consumption.**

## RECOMMENDED CHANGES TO THE MEAT INSPECTION ACT AND REGULATIONS

Currently, under Sec 2(1) of the *Meat Inspection Act (MIA)*, the director can appoint “*other persons*” as inspectors, which could allow for mobile butchers, or anyone to become appointed or certified as an inspector. Furthermore, under Sec 11(c) of the MIA it states that the Lieutenant Governor in Council may make regulations “*prescribing the powers and duties of inspectors or any class of inspectors*” which could allow for regulations to be developed for a class of “ante-mortem inspectors” only, and which could apply to persons other than veterinarians.

Further recommended changes to the *Meat Inspection Act* could include:

- **Sec 4(1):** Amend to read “*Except as provided in the regulations, no person shall slaughter an animal unless the animal has been inspected by an individual trained in ante-mortem inspection or verified by an appointed inspector immediately before the time of slaughter*”



- **Sec 4(2):** Amend to include “*or livestock owner*” after “*mobile butcher*”

Further changes to the *Meat Inspection Regulation* should include:

- **Sec 32(3):** Amend regulation to include “*unless the mobile butcher is approved for ante-mortem and/or post mortem inspections*” after “*UNINSPECTED-NOT FOR SALE*”
- **Sec 43:** Remove “*emergency*” from legislation to read “*Where an inspector is outside a meat facility and there is a situation which, if the same circumstances existed in a meat facility, would be such as would empower the inspector to adopt certain measures under other provisions of this Regulation, the inspector may exercise those powers as if in a meat facility*”
- Create a provision for a special class of inspectors for ante-mortem inspection.
- Ensure mobile butchers can hold both a mobile butcher license and be certified as an ante-mortem inspector.
- Ensure producers can use remote video in collaboration with a veterinarian or appointed inspector for ante-mortem inspection on the farm.

## CONCLUSION

While we recommend changes to ante-mortem inspection, including to allow for individuals, other than veterinarians to become trained and appointed as “ante-mortem inspectors”, we also recognize the importance of ensuring our high level of food safety standards remain intact. We also recognize there is the potential of a slight increased risk associated with animals that are slaughtered on-farm and inspected by the new class of “ante-mortem inspectors”, however this could be mitigated with tools like increased liability insurance, periodic audits, mentoring and shadowing of inspectors in training, or other programs that will ensure integrity in our food safety system and protocols.

The Alberta Beef Producers appreciate the opportunity to help improve how we do inspections on farm and would welcome further engagement on addressing this issue.

For further questions please contact:

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## APPENDIX

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### ABP 2018 Resolutions:

*“Be it resolved that the appropriate ABP committee encourage Alberta Meat Inspection to allow mobile slaughter of accidentally compromised animals to achieve some sort of “inspected” status that would allow health protein to be harvested for human consumption”- Carried*

*“Be it resolved that ABP lobby the Alberta government to promote farm inspection for non-ambulatory animals to be slaughtered and used for human consumption”- Carried*

### Other Province’s Regulations

Source: <https://www.cbc.ca/news/canada/edmonton/homegrown-rules-wild-meat-animals-producers-hunters-1.4836719>

### Saskatchewan Meat Inspection

It is important to note that meat inspection is voluntary in SK, and meat does not need to be inspected to be sold, however most processing facilities participate in the “*Domestic meat inspection program*”. There are no regulations concerning sales of meat at the farmgate in SK which means a consumer can buy meat that is not inspected directly from a farm if they choose to. (Provincial Auditor Saskatchewan, 2012)

### British Columbia

- Producers can obtain different classes of slaughter licenses that allow them to sell animals that were killed on-farm
- Class E license allows on-farm slaughter for direct sale to consumers
- Sales restricted to the region in which the meat was produced and operators are only permitted to slaughter their own animals

BC Food Safety Act *Meat Inspection Regulation (2014)*

#### **Emergency slaughter other than at slaughter establishment**

**14.1 (1)** Despite sections 12 and 13.1, an animal intended for slaughter after inspection under section 12 may be slaughtered and the carcass delivered to a slaughter establishment for inspection under section 15 if all of the following requirements are met:

- a) the slaughter is necessary because the animal
  - i. is in a physical condition that precludes it from being transported to a slaughter establishment without undue suffering, or
  - ii. poses a high risk of significant injury to humans if it is transported to a slaughter establishment;
- b) before the slaughter, a veterinarian
  - i. approves the slaughter as meeting the requirements of paragraph (a), and

- ii. prepares and signs an emergency slaughter approval form;
  - c) after the slaughter, the carcass and the emergency slaughter approval form are delivered to the slaughter establishment as soon as practicable;
  - d) before accepting delivery of the carcass, the licence holder for the slaughter establishment, or an authorized employee of the licence holder, completes and signs the emergency slaughter approval form to indicate that acceptance.
- (2) If a carcass has been accepted for delivery under this section, the licence holder must
- a) notify an inspector of the acceptance as soon as practicable,
  - b) deal with the carcass in accordance with section 14 (1) (c), and
  - c) provide the emergency slaughter approval form to the inspector before the inspection under section 15 is conducted.
- (3) After completing the inspections referred to in section 14 (1) (c), the inspector must complete and retain the emergency slaughter approval form

### Newfoundland

- Wild meat that is hunted can be sold to anyone (including a restaurant) who holds a wild meat service license. Hunters who sell their wild meat must also have a permit to sell the meat.

**Figure 3—Varied Approaches to Regulating Meat in Canadian Provinces 2012**

	BC	Alta	SK	Man	Ont	Que	NB	PEI	NS	Nfld-L
<b>Agriculture</b>	X <sup>a</sup>	X	X	X	X	X			X	X
<b>Health</b>			X				X	X		
<b>Inspect all meat before sale</b>	Yes except remote locales	Yes	No	Yes except poultry	Yes	Yes	No	Yes cold carcass	Yes except farmgate	No
<b>Allow farmgate sales</b>	No	No	Yes	No except poultry	No	No	No	No	Yes	Yes

Source: September 2012 information from Saskatchewan Ministry of Agriculture and Ministry of Health.

### On-Farm Emergency Slaughter contacts:

For more information about emergency on-farm slaughter, including a list of appointed inspectors, abattoirs, and mobile butchers in your area, contact the following regional meat inspection offices: Airdrie 403-948-8514, Edmonton/Grande Prairie 780-427-7011, Vermilion 780-853 8113 and Lethbridge 403-382-4261, or toll-free by first dialing 310-0000.

