



Granby, January 13, 2021

Pat Finnigan, MP, Chair  
Lianne Rood, MP, Vice-Chair  
Yves Perron, MP, Vice-Chair  
Aimée Belmore, Clerk  
Standing Committee on Agriculture and Agri-Food  
131 Queen Street, 6th Floor  
House of Commons  
Ottawa, Ontario K1A 0A6

Subject: The committee's study on "processing capacity"

Dear Mr. Chair:

We are writing to you today to contribute to your committee's current study concerning Canada's *processing capacity* and to offer our suggestions.

Our organization is called *Le petit abattoir solidarity co-op*. The project consists of a modular micro-slaughterhouse solution for poultry, operated in a solidarity co-op, under federal inspection. Our mission is to provide poultry slaughtering services to small-scale productions that are ill-suited for industrial and automated facilities. The project consists of converting four ocean containers into a slaughter unit that meets the Canadian Food Inspection Agency's HACCP inspection standards. This unit can be used permanently or as a first step before investing in a fixed construction, depending on increased demand. In addition to being a less expensive investment than a conventional building, the main advantages of this type of structure are its mobility and the option to sell the structure and move it to another region so that it can be developed into a new business ecosystem when it is no longer needed in its region of origin. The model will be reproducible and adaptable in various regions, and we plan to support Canadian communities in developing and implementing their solution. Currently, the co-op has 32 members, including small-scale producers, backyard producers, chefs and butchers, as well as members of the public who act as support members.

As was pointed out during the committee's work, the current health crisis has remarkably amplified a fundamental shift toward supporting local businesses, small-scale farms that sell through short channels, and the practice of this type of agriculture, which provides structure for the regions and creates social ties. It has also been amply reaffirmed that COVID has highlighted the fragile nature of Canada's processing capacity and the need to remedy it. What has perhaps been less discussed, which we would like to do today, is how to address this concept of *capacity*.

With respect to slaughter, there are two approaches. First, one can look at processing capacity based on the number of head and determine that the slaughtering capacity based on the number of head produced in the country is sufficient, but weakened by infrastructure concentration, and that remedying the weaknesses within the current facilities and networks will solve the problem.

However, from the perspective of territorializing food systems, and their resilience, this *capacity* must be looked at in terms of geographic proximity between producers and processors and the ability to mesh production scales.

Otherwise, the problem remains unresolved.

In fact, in the past few decades, we have seen what could be called a “technology gap” appear between small- and medium-scale production and the large-scale production network. This gap was created by the decreased number of slaughterhouses and their increased size and line speed. On one hand, there is traditional production that, fortunately, benefits from increasingly efficient infrastructure that is well adapted to its production scale. On the other hand, there is a growing number of small farms that are increasingly less served and increasingly less compatible with the remaining slaughterhouses, which are more mechanized and more automated.

It has been noted that small producers face numerous issues: travelling hundreds of kilometres with their animals to the few slaughterhouses that still process small animal consignments and, as such, not being able to ensure animal welfare according to the value system that guides their work as producers. In addition, they do not always have the guarantee of traceability (leaving the slaughterhouse with the animals that they brought), which is essential to the marketing of distinct products, such as heritage breed animals or extensive farming techniques. They must also assume the additional workload and financial burden associated with transportation. Lastly, dependency and the power relationship are always to the operator’s advantage, which limits the producer’s ability to request accommodations, such as offal recovery, or to express their dissatisfaction.

These small farms are therefore increasingly prevented from viably meeting consumers’ growing demand for the type of products that they offer. In terms of capacity, traditional production and small-scale, short-channel farms are not facing comparable situations, and that justifies addressing the issue of processing capacity based on these two distinct networks.

The situation in this country is not unique: elsewhere in the world, there has also been a decrease in the number of small-scale slaughterhouses in the last 40 years (see below for examples from the United States, France and the United Kingdom, to name but a few).

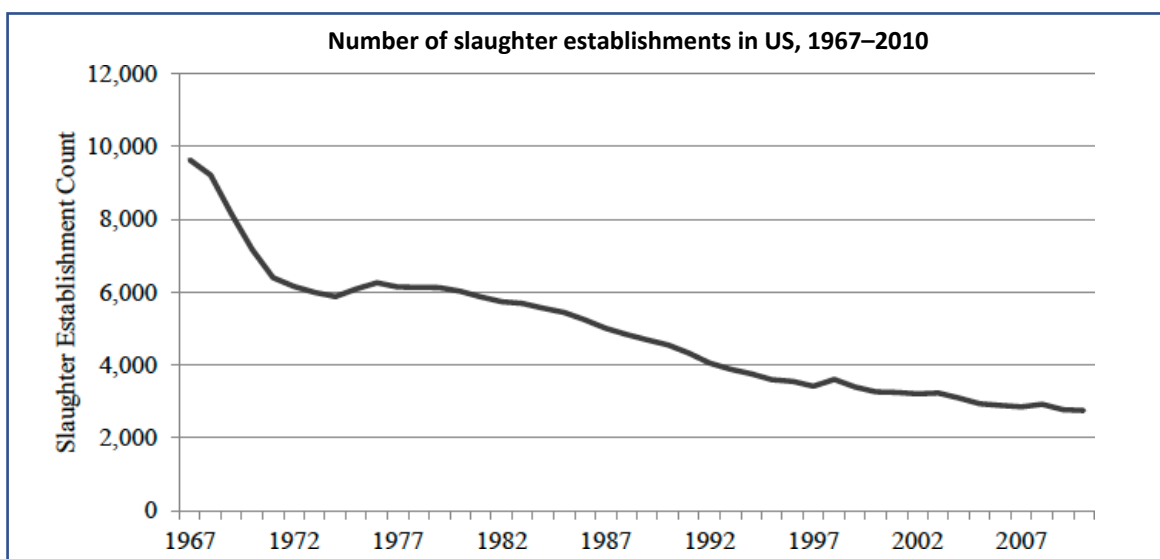


Figure 1- Number of slaughter establishments in the United States, 1967–2010  
Source: USDA Livestock Slaughter Summaries 1969–2011

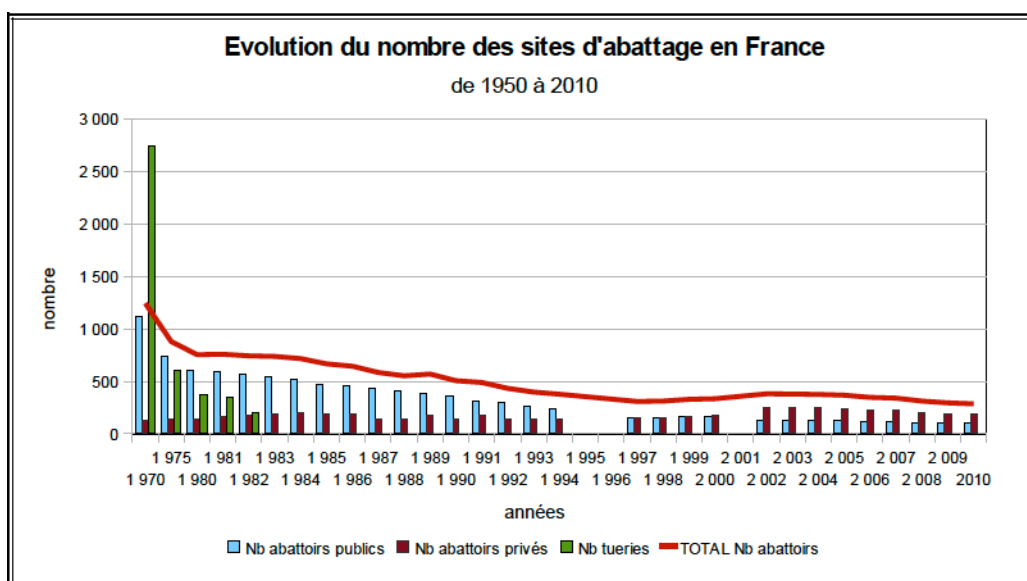


Figure 2- Number of slaughter establishments in France from 1950 to 2010  
Source: Report from the du Conseil général de l'alimentation, de l'agriculture et des espaces ruraux [High Council for Food, Agriculture and Rural Areas] (CGAAER)  
"Filière abattoir : synthèse des études et données économiques et sanitaires disponibles fin 2010"  
[Slaughter establishment sector: synthesis of economic and health studies and data available at the end of 2010], No. 10227, June 2011.

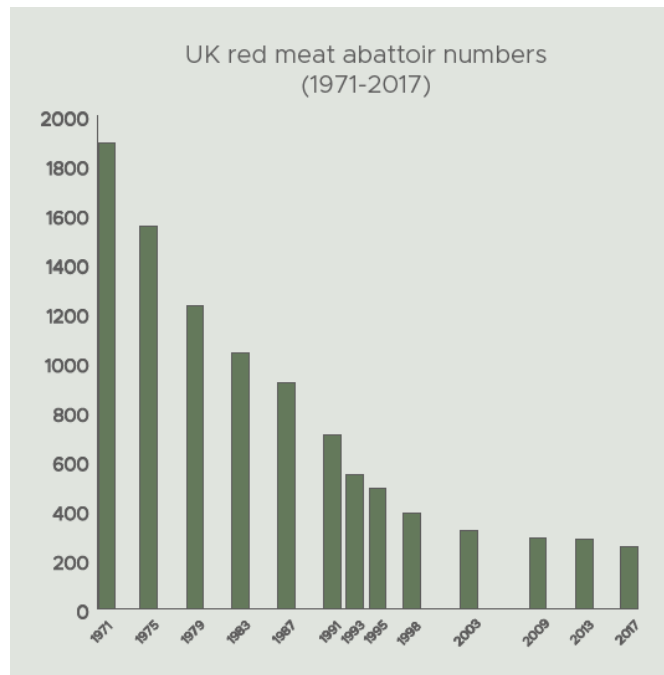


Figure 3- Number of red meat slaughterhouses in the United Kingdom, 1971–2017

Source: “A Good Life and a Good Death: Re-localising farm animal slaughter”, Sustainable Food Trust, 2018.

These various countries have all reached the same conclusion about the problems caused by this decrease in the number of facilities and acknowledge that action is necessary, for various reasons: ensuring animal welfare, strengthening the local supply chain, supporting small- and medium-scale livestock farms, and promoting regional development. To do so, several solutions have been put in place or are underway.

In the United States, there are numerous solutions. By relaxing some of the regulations, farm slaughter is permitted with a permanent inspection exemption for each carcass, which is known as custom slaughter. To increase slaughter capacity because of COVID, the House of Representatives is currently studying the *PRIME Act*,<sup>1</sup> a bill that would allow meat from these custom-exempt slaughterhouses to be sold to restaurant owners, hotels, restaurants and institutions, butchers and resellers, as long as they are within State limits. In this country, mobile slaughter is also permitted in specially equipped trucks (mobile processing units or MPUs) operated under federal inspection and sometimes even funded by the USDA<sup>2</sup>; there is also slaughter in micro-slaughterhouses built in modules, which are sometimes also under federal inspection. Through its programs, the U.S. government financially supports communities in their facility projects.<sup>3</sup>

Like what is currently being tested in the Netherlands, Belgium and France have new mobile slaughterhouse projects.<sup>4</sup> In Germany and Switzerland, pasture slaughtering

<sup>1</sup> PRIME [Processing Revival and Intrastate Meat Exemption].

<sup>2</sup> <https://www.agbizcenter.org/blog/2014/09/mobile-poultry-processing-unit-receives-usda-funding/>

<sup>3</sup> <https://www.rd.usda.gov/programs-services/rural-business-development-grants>

<sup>4</sup> See the following links: <https://www.slu.se/en/departments/animal-environment-health/research/research-project/Small-scale-and-mobile-slaughter/>, <https://www.sillonbelge.be/3872/article/2019-03-01/la-wallonie-devrait-bientot-disposer-dunites-mobiles-pour-labattage-de-bovins>, <https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000038376735/>

is permitted:<sup>5</sup> animals are slaughtered and bled in the field, then quickly transported to the slaughterhouse, where they are eviscerated and dressed. In France, there have been efforts in recent years to revive community slaughterhouses, also known as public slaughterhouses, which were put in place in the 1960s and waned over the last 20 years before once again having their social utility recognized and supported today.<sup>6</sup> In Great Britain, small-scale slaughterhouses are currently being considered by policymakers,<sup>7</sup> who are looking into the best ways to safeguard small-scale slaughter capacity in the regions: creation of an emergency fund, grants to build or modernize small slaughterhouses, subsidization of wastewater treatment systems and management of inedible products, creation of mobile slaughterhouses, etc.

Regulatory relief is also being considered abroad. In that respect, the European example of the Hygiene Package is very inspiring, as it removes the barriers to entry by allowing animal welfare organizations and farmers to work together to establish slaughter procedures that are safe with respect to health and animal welfare, and by certifying the facility rather than the carcass of each animal<sup>8</sup>; this introduces the concept of slaughterhouses governed by two different statuses: licensed facilities and unlicensed slaughterhouses<sup>9</sup> that are exempted from permanent inspection but authorized to sell directly to consumers and retail businesses. With regard to records management, these same establishments can keep a log solely of instances of non-compliance rather than of all the results of tests and observations. In an ongoing effort to maintain flexibility, the European regulations concerning inspection also mention the need to consider the reality and specific characteristics of artisan production.<sup>10</sup>

Given these many and diverse examples, we note that Canada is behind on these issues, and we believe that the work of the Committee on Agriculture and Agri-Food is timely and extremely relevant. We would also like to provide some points to consider to strengthen the processing capacity of the small-scale farm network.

- The goal must be to increase the number of small slaughterhouses in the regions and adopt a mobile slaughter strategy. Such a network of facilities would help create a climate that promotes investment, reduce economic uncertainty and increase the viability of businesses and the food security of communities, all while ensuring animal welfare, especially when it comes to mobile slaughter. With a nearby facility adapted to their reality, small-scale farmers will increase their flocks, others will diversify their production, and

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<sup>5</sup> <http://www.web-agri.fr/conduite-elevage/sante-animale/article/pour-eviter-le-stress-la-suisse-autorise-l-abattage-a-la-ferme-au-fusil-1184-120803.html>

<sup>6</sup> <https://www.ouest-france.fr/economie/agroalimentaire/dans-l-ouest-les-abattoirs-publics-se-rebiffent-7110421>

<sup>7</sup> <https://appaw.org/2020/06/07/>

<sup>8</sup> <https://agriculture.gouv.fr/circuits-courts-exigences-sanitaires-et-flexibilite-pour-les-petites-entreprises>

<sup>9</sup>

<https://agriculture.gouv.fr/telecharger/93174?token=e36154b944f26b4546bb39837ac2e78a14085a70cdb51646df1b10f95f3424f7>

<sup>10</sup> “Flexibility is appropriate to enable the continued use of traditional methods at any of the stages of production, processing or distribution of food and in relation to structural requirements for establishments. Flexibility is particularly important for regions that are subject to special geographical constraints .... However, flexibility should not compromise food hygiene objectives.” Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for on the hygiene of foodstuffs, (19). See also <https://agriculture.gouv.fr/la-reglementation-sur-lhygiene-des-aliments>

new farmers will come to the region. A slaughterhouse is not only a slaughterhouse; it is a tool for rural development.

- There is an urgent need to introduce non-repayable assistance to provide community initiatives with indispensable start-up capital to implement their solutions. In fact, at the community level there is knowledge, energy, willingness and solidarity in which we must invest, as the only things missing are the financial resources. Many opportunities will be wasted if we do not capitalize on the community's strengths, motivated by need, it too being a guarantee of success. It is important that this financial assistance not be considered a grant but rather an equity investment, so as not to interfere with the ratios required by the grant programs that the projects will inevitably need.
- One issue that has come up often in this committee is the regulatory burden on the agri-food sector. Instead, we would like to highlight the organizational culture in many government departments where the focus is quite often on the means rather than the results. We must rethink the "one size fits all" approach by allowing the means to be adapted to a goal that is the same for everyone, regardless of the means used. It should be stressed that the goal of small-scale operators is not to find a way to avoid complying with the standards, but rather to meet the standards with their own means, which are often more limited than in conventional facilities. Fortunately, in each of these government departments there are very competent, open-minded human beings who demonstrate a respectful attitude that allows us to innovate with confidence. Within the government departments, this way of addressing small-scale processing should become the goal, in order to restore the climate of trust and allow stakeholders to create and seize opportunities. We feel that it would be wise to create a working group that would propose concrete measures for food hygiene control that is more sensitive to the specific characteristics of artisanal products, and to set up an oversight committee to ensure implementation. Among other things, this working group should examine the possibility of creating a specific status for small-scale, self-monitored slaughterhouses without permanent inspection but with the right to market products, modeled on the unlicensed slaughterhouses from the Hygiene Package in Europe, or that of the custom slaughterhouses under the *PRIME Act* in the United States.

We hope that the committee's work will result in an understanding and consideration of the issues specific to small-scale production and processing, in order to implement solutions that are tailored to the sector. Establishing a network of small slaughterhouses like ours would greatly contribute to the dynamic development of the regions, safety in the local supply chains, and the viability of thousands of businesses across the country.

We are available to discuss issues and solutions with you.

Sincerely,

A handwritten signature in black ink, appearing to be 'V. S.' or similar, with a stylized flourish at the end.

Fernande Ouellet, Coordinator  
Le petit abattoir solidarity co-op