



## OFSO Holders Alberta Survey Guide

prepared by the NFU

Once you get into the survey, it states upfront that the main reasons for this regulatory change include **a dramatic increase in uninspected meat**, and **a concern about a major foodborne illness outbreak** similar to Fueling Minds Daycare, that many—including public health officials—have implied had something to do with uninspected slaughter. [A couple of investigations have turned up “illegal, uninspected slaughter facilities”](#), but not directly mentioned whether they were OFSO license-holders.

Alberta Health Services really dislikes the OFSO program, so that is probably one reason why they’re attempting to limit the numbers:  
<https://www.albertahealthservices.ca/assets/wf/eph/wf-eh-selecting-safer-meat-sources-in-alberta.pdf>

The survey introductory text also makes it clear that AAI was surprised by the number of animals being slaughtered under the OFSO license. They say “Investigations have revealed some OFSOs routinely slaughtering large numbers of animals—well beyond ***the program’s original intent of small-scale, household-level use.***”

And yet earlier they state quite clearly that the original intent of the program was “***to help address the backlog of animals waiting to be slaughtered in provincially and federally inspected abattoirs and to make local meat more accessible***”.

They can’t have it both ways. We need to draw out their incompatible interpretations of what they intended to do with this OFSO program, and challenge them on that.

**Why Not Make Better Changes?**

Finally, this survey is a great opportunity for you to suggest some real changes that would make the system better. The suggestions that we've included below contain some ideas for better changes that could be made to the on-farm slaughter program.

**\*NOTE\***

**What follows is the actual text of the survey, with our added bits in yellow highlight. Most of the survey is multiple choice. We've provided context with each of these questions to help with your choice. Each section ends with an open-ended question allowing for a response. We've provided suggestions for each response, but feel free to use the text from the context in the preceding questions.**

---

## The Survey

### Section: Uninspected Slaughter Limit

Alberta's government is planning to implement annual uninspected slaughter limits for OFSOs to reduce the amount of uninspected meat circulating in the province and to reduce the likelihood of foodborne illness outbreaks.

Like most provinces in Canada, Alberta requires all meat sold commercially to be slaughtered in a provincially or federally inspected abattoir. The number of animals that may be slaughtered by local producers in inspected facilities is unlimited.

Alberta and British Columbia are the only provinces in Canada that allow the slaughter of uninspected meat under a licence. B.C. enforces annual uninspected slaughter limits, making Alberta the only province that currently permits unlimited uninspected slaughter under its OFSO licence.

The government wants to hear from OFSO licensees on how uninspected slaughter limits could be put in place without causing unnecessary hardship for current OFSOs.

#### *Weight Limits by Animal Type and Size*

For the purposes of this survey, please refer to these definitions below as you complete the questions.

**Uninspected slaughter weight** (implied): The live weight of animals at the time of slaughter. This is used to calculate the slaughter limit.

**Uninspected slaughter limit by species** (implied): A proposed approach where annual uninspected slaughter live weight limits are set per species, rather than a single overall weight limit.

**5. Please indicate whether you agree or disagree with the following statement (multiple choice):**

Annual uninspected slaughter weight limits for OFSOs should be different depending on animal size. For example, large animals like bison, cattle or elk would have a different slaughter limit than small animals (like chickens).

Options: **Strongly Disagree** | Somewhat Disagree | Somewhat Agree | Strongly Agree | Unsure

**NFU Context:** The current weight limit functionally takes into account the animal size. Under the current limit of 2,250KG, farmers have to make decisions about how they will allocate their limit. For example, one large animal (bison, cattle or elk) is equal to approximately 14 lambs, or about 50-100 broiler chickens. We need higher weight limits across the board to ensure a pathway to farm viability, and flexibility within the program so that it adequately serves the needs of Albertan farmers and OFSO licence holders.

The Government of Alberta should seriously consider implementation of a program similar to [British Columbia's Farmgate Plus Licensing Program](#), which uses an annual combined total live weight limit of 25,000 lbs for all animals slaughtered per farm premises. i.e. one beef = 1 'animal unit' = 1,000 lbs. The Farmgate Plus program also allows for the custom slaughter of neighbouring farm animals, which counts towards the permitted weight limit for the licensee.

If Alberta were to adopt the 25,000 lbs limit, that would equal approximately 25 beef cattle and 2,500 broilers or pasture raised chicken. This limit should be sufficient, and therefore different slaughter weight limits by animal would not be needed.

**6. What is your level of concern, if any, about implementing an annual uninspected slaughter limit for OFSO licences (multiple choice)?**

Options: Not at all | Not very | Somewhat | **Very** | Unsure

**NFU Context:** If the Ministry applies any limit, it brings into question the viability of the OFSO program for farmers, and completely negates the investments that Alberta farmers have made into their farms and processing facilities over the past five years. These investments include breeding stock and fencing, buildings, equipment for feed production, amongst many others to ensure that the OFSO licence requirements are met and the licence is worth it to farmers. These infrastructure investments would not be viable without the OFSO license, because (PICK A REASON):

- There are no abattoirs within 3 hours;

- The abattoir charges more than my cost of production;
- My customers won't / can't pay to cover the fees of an abattoir;
- Etc.

## 7. Do you have anything to add about uninspected slaughter limits by animal type?

### Suggested response:

Alberta farmers have invested money into developing our livestock production over the past five years based on the limits set out in our OFSO license. This all would be lost without an OFSO license that can allow farmers to operate at an economically viable scale because (PICK A REASON):

- There are no abattoirs within 3 hours;
- The abattoir charges more than my cost of production;
- My customers won't / can't pay to cover the fees of an abattoir;
- Etc.

If the Alberta Government is going to place a limit on uninspected OFSO capacity, we need higher weight limits across the board.

We need a plan like Farmgate Plus in BC. "Farmgate Plus licence holders can sell meat products direct to consumers, retail, restaurants, and at farmers markets province-wide". The numbers BC allows (combined total live weight limit of 25,000 lbs) are enough for us.

Better changes could include, for example:

- allowing direct-market sales—with full traceability—of on-farm slaughter;
- adding pathways to increase scale, both for the farm and among neighbours in the area;
- adding hybrid options for inspected slaughter (i.e. inspectors only required on certain dates, depending on scheduled volume);

These could go hand-in-hand with a rural revitalization initiative that could include:

- providing cash advances for small producers to be able to invest in the infrastructure needed for on-farm slaughter (pad and refrigeration);
- Providing training and hire more inspectors;
- Providing fully-funded training in artisanal butchery programs, and 50% funding for graduates for the first 3 years (to ensure appropriate compensation for mentorship, as well as assisting with retention);
- massively increased long-term investment in publicly-funded regional facilities, to provide alternative capacity to under-served regions;
  - e.g. combining investments in custom kill, mobile 'slaughter trucks', shared regional hanging space, butcher capacity, and training;

---

### **Section: Uninspected Slaughter Limits: Large Animals**

The following section focuses on the uninspected slaughter of large sized animals weighing on average more than 1,000 lbs. Examples of animal types in this category include bison, elk and cattle.

**8. Which of the following types of large animals (more than 1,000 lbs) are currently processed through uninspected slaughter at your OFSO?**  
**Select any that apply:**

Options: Bison | Elk | Cattle

---

### **Section: Uninspected Slaughter Limits: Medium-sized Animals**

The following section focuses on the uninspected slaughter of medium sized animals weighing on average between 90 to 300 lbs. Examples of animal types in this category include sheep, goats and hogs.

**9. Which of the following types of medium animals (90 to 300 lbs) are currently processed through uninspected slaughter at your OFSO?**  
**Select all that apply:**

Options: Sheep | Goats | Hogs

---

### **Section: Uninspected Slaughter Limits: Small Animals**

The following section focuses on the uninspected slaughter of small sized animals weighing on average between 3 to 20 lbs. Examples of animal types in this category include turkeys, chickens, ducks and rabbits.

**10. Which of the following types of small animals (3 to 20 lbs) are currently processed through uninspected slaughter at your OFSO?**  
**Select all that apply:**

Options: Turkeys | Chickens | Ducks | Rabbits

---

### **Section: Additional Requirements for High Volume Uninspected Annual Slaughter**

In Alberta, all meat sold commercially must be slaughtered in a provincially or federally inspected abattoir.

Every year, Alberta meat inspectors identify beef, pork and poultry at licensed facilities that are marked as unfit for human consumption due to contamination, disease or

inadequate antibiotic/medication withdrawal periods. This results in thousands of animals that are removed from the food system to protect Albertans from unsafe meat. OFSOs do not have the same food safety controls that are in place for inspected abattoirs. They do not have specially trained meat inspectors confirming the health of every animal before and after slaughter.

If the government considers allowing higher annual uninspected slaughter limits in certain circumstances, additional requirements would be necessary to protect public health and animal welfare.

**11. Please indicate whether you agree or disagree with the following statement (multiple choice):**

*If annual uninspected slaughter limits above 5,000 lbs were implemented, it is reasonable to increase the frequency of on-site government inspector assessments.*

Options: **Disagree** | Agree | Unsure

**12. Please indicate whether you agree or disagree with the following statement (multiple choice):**

*If annual uninspected slaughter limits above 5,000 lbs were implemented, it is reasonable to restrict the number of animals an OFSO could slaughter per day based on the operational capacity (e.g., chilling or processing space) of the specific OFSO.*

Options: **Disagree** | Agree | Unsure

**13. Is there anything else you want to tell us about additional requirements for high volume uninspected slaughter?**

**Suggested response:**

The number that is being proposed in this consultation is too low. If a farmer is processing beef, bison, or even hogs, that's 5-10 animals per year or 250-500 chickens per year. The non-quota broiler limit is 2,000 birds, Alberta farmers need a weight limit that allows a farm with that number of birds to slaughter them under the OFSO license.

We need a plan like Farmgate Plus in BC. The capacity allowed by British Columbia (combined total live weight limit of 25,000 lbs per year) is enough for us, but would not be considered "high volume".

It would also make sense to allow some "high volume" licenses, over 25,000 lbs per year, in certain regions where there is no access to abattoirs. This would allow for custom slaughter for neighbours who might not have adequate potable water flow; space for an adequate cut-and-wrap area; or internet service, among many other restrictions.

It would make sense for the OFSOs and Inspection service to work together with those “high volume” OFSOs, to schedule custom slaughter days that maximize the capacity of the particular OFSO farm (e.g. chilling/processing space, live animal holding space), and schedule an inspector for those days.

---

## Section: Transportation

Transporting carcasses for further processing.

### 14. Please indicate whether you agree or disagree with the following statement (multiple choice):

*To minimize the risk of foodborne illness, it is reasonable to restrict the transfer of uninspected carcasses from one OFSO to another OFSO.*

Options: **Disagree** | Agree | Unsure

*Note: Carcasses could still be transported from an OFSO to an inspected facility.*

**NFU Context:** If you're transporting a carcass anywhere off farm, to any facility for further processing, it should be done using proper transport. Limiting the transfer of carcasses means neighbouring OFSO farms can't e.g. share cut and wrap or further processing facilities.

---

## Section: Processing

Processing introduces opportunity for pathogenic bacteria to contaminate meat. Grinding and processing non-intact meats—such as sausages, fermented, smoked, or cooked products—mixes surface bacteria into the interior, increasing the risk of contamination by pathogens like E. coli. Grinding can also introduce physical hazards, such as metal fragments from equipment. These practices make ground and non-intact meats high-risk products for foodborne illness.

“*Cut and wrap*” refers to breaking down a whole carcass into raw portioned pieces of meat and packaging them. This can include deboning, trimming, slicing, and portioning meat into steaks, roasts, and other cuts.

### 15. Please indicate whether you agree or disagree with the following Multiple choice:

*To minimize the risk of foodborne illness from uninspected meat, it is reasonable to limit uninspected processing to ‘cut and wrap’.*

Options: Disagree | **Agree** | Unsure

**NFU Context:** Any further processing should be done in a facility inspected by the regional health unit, by trained staff. There is no reason that this facility cannot be located on the same farm, but this should be outside of the mandate of slaughter inspectors.

---

## Section: Zoning Requirements

Currently, OFSOs must indicate that they meet municipal or county zoning requirements.

### 16. Please indicate whether you agree or disagree with the following statement (multiple choice):

*It is reasonable to require that confirmation of municipal zoning approval be submitted to the province, including a carcass waste disposal plan.*

Options: Disagree | **Agree** | Unsure

**NFU Context:** This is not an onerous request, templates from BC would assist in making this workable for Albertan farmers.

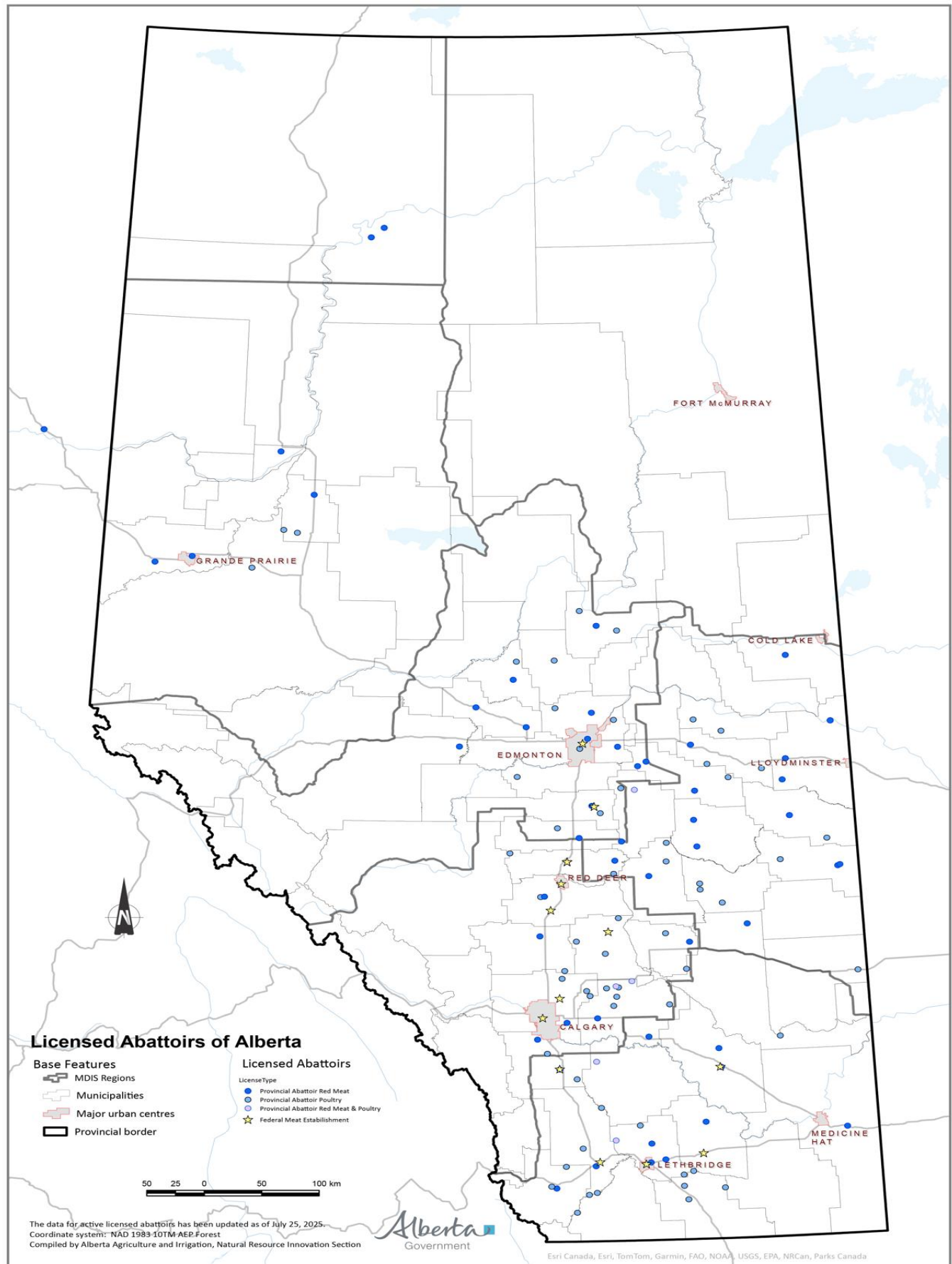
### 17. Is there anything else you want to share about transportation, processing and permitting for OFSOs?

**Suggested response:**

If operators are transporting a carcass anywhere off farm to a facility for further processing, it is required to be done using proper transport. Limiting transfer of carcasses means neighbouring OFSO farms can't share cut and wrap facilities or do any further processing, placing extra costs on OFSO operators and limiting the effectiveness of the OFSO program to provide diverse meat processing facilities to Alberta farmers. That is an unnecessary restriction.

Any further processing should be done in a facility inspected by the regional health unit by trained staff. There is no reason that this facility could not be located on the same farm, but this should be outside of the mandate of slaughter inspectors as any further processing is different from the initial slaughter activities permitted by the OFSO licence.





---

## Section: Inspected Abattoirs

Local producers can have unlimited numbers of animals slaughtered in provincially inspected abattoirs and the resulting meat can be sold across Alberta including in local farm-gate stores, farmers' markets, butcher shops or grocery stores. Additionally, meat from animals slaughtered in federally inspected abattoirs can be sold across Canada and internationally. This section seeks to better understand OFSOs' use of provincially or federally inspected abattoirs. Your reply will help identify any opportunities and challenges, barriers, and considerations that influence whether animals are transported off-farm for slaughter.

Please answer the following questions based on your current practices and experiences.

**18. Using the map provided, about how far away is the closest inspected abattoir from your OFSO?**

**50km increments to 300km**

**19. What are the first three characters of your postal code? (e.g., T5K)**

**20. Have you ever sent animals to provincially or federally inspected abattoirs to be slaughtered?**

**21. At what distance does transporting animals from your operation to an inspected abattoir for slaughter become unprofitable?**

**50km increments to 300km**

**22. Would you consider applying to become a provincially or federally inspected abattoir?**

**Consider adding the following in your answer to this question:**

The Ministry / Provincial administration would like to 'solve' the problems of lack of capacity and access to slaughter space, and frequently increased demand for local meat—and have the "health and safety" reassurances of the formal inspected slaughter system—with the least possible commitment and responsibility, and without further investment. This is the opportunity to make it clear that:

- They need to pony up if they want the results that they're looking for;
- We've lost local abattoirs because

- for 40 years we've invested almost all of our funds in developing the export markets,
- we've cut back on all funds supporting local abattoirs—while asking them to meet new standards;
- We've cut back on funding for inspectors while asking them to be enforcers

Also consider including these questions in your answer:

- Will you commit to a matching start-up funding grant for new provincial abattoirs?
- Will you commit to establishing and maintaining scale-appropriate regulations, and fully funding all changes required by new regulations for provincially-licensed abattoirs?
- Will you commit to re-training your Inspection team and providing them with a mandate of facilitating the success of their abattoirs?
- Will you commit to providing fully-funded training in artisanal butchery programs, and 50% funding for graduates for the first 3 years (to ensure appropriate compensation for mentorship, as well as assisting with retention)?

### **23. Do you have anything else to share about using inspected abattoirs?**

There is more to think about than “is there an abattoir near you?”

Considerations to include in your answer:

You have not asked these questions:

- Do you use more than one abattoir?
  - Will the abattoir closest to you slaughter all of the animals that you need slaughtered?
  - How close is the nearest feather abattoir (that slaughters chickens, ducks, turkeys)?
- How much does each abattoir charge you per head for slaughter, cut and wrap?
  - How much has that slaughter price increased in the last 5 years?
  - Has availability / booking times at your abattoir[s] remained constant or changed over time?
  - Will they let you book 12 months in advance, and honour that booking?
- Does the nearest inspected slaughter facility have a bad reputation (e.g. for theft of product, poor / inconsistent cutting, animal welfare, bad conditions, etc.)?
  - If so, how far away is the 2nd closest inspected abattoir from your OFSO?