

## Hare, Lynette E AGRI:EX

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**From:** Pritchard, Jane AGRI:EX  
**Sent:** Tuesday, April 24, 2018 12:26 PM  
**To:** Hare, Lynette E AGRI:EX  
**Subject:** FW: Briefing materials about raw milk  
**Attachments:** Cantelon Raw milk response 170421 June 2010.docx; Webmaster Elizabeth Cook Raw Milk Oct 20 2010.docx; 173791 DN production of soft raw milk cheese (2).docx

This as well.

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**From:** Pritchard, Jane AGRI:EX  
**Sent:** Tuesday, January 2, 2018 5:30 PM  
**To:** Dennett, Thom AGRI:EX  
**Cc:** Anslow, Martha AGRI:EX  
**Subject:** RE: Briefing materials about raw milk

Hi Thom,

Below is a very long email chain about raw milk and jurisdictional issues from 2008 before I was involved that I thought might help.

I do not have briefing materials on raw milk but I have some material I put together in 2010 that weren't used. Those are attached. I am going to presume that you are talking about the sale of raw milk to the public and not raw milk cheese but just in case I also attached a note on raw milk cheese.

Raw milk production itself is not an issue, raw milk is produced on BC's provincially licensed dairy farms but under the Milk Industry Act MUST be sold directly to the Milk Marketing Board and cannot be otherwise sold or distributed. It also cannot be picked up and transported by anyone other than a Bulk Tank Milk Grader licensed under Agriculture's Milk Industry Act. That said our Act and its regulations are not very forceful and so the last attempt to prosecute a raw milk distributor was carried out under the Health Act.

The Health Act, under one of its regulations names raw milk as a health hazard and so its sale and distribution is illegal under that. Essentially without a kill step for bacterial contaminants of raw milk, it cannot be sold. Pasteurization at a dairy processing plant is the most common 'kill step'.

Raw milk is a high risk. If you are the farmer with the cow on your property and you are milking said cow twice a day you likely are both exposed to the same bugs and the raw milk isn't going to kill you or make you sick. If however it is being delivered or you are picking it up and your world is a nice clean urban one, that milk can make you very very sick and possibly kill you. *Campylobacter jejuni*, *Salmonella spp.*, *E. coli O157:H7* and *Listeria spp.* can all be in raw milk. Fortunately we no longer have Brucellosis and Tuberculosis in raw milk, but in fact it was not that long ago that we did. Raw milk, raw eggs, raw chicken, raw hamburger, all the same risks, and these are documented regularly on ProMed with outbreaks of disease associated with raw milk. But people will fight for their right to have access to raw milk for reasons that verge on religion it seems and so I personally feel that they can accept the risks for themselves and the lives of their children they are putting at risk, sort of like smoking.

Also there is no way to test raw milk to determine that it is safe as each sample you take will be different, you would have to test every glass. Normal bacterial counts in milk are regulated to be under 112,000 bacterial

cells per ml. That is done to insure a long shelf life for pasteurized milk. These bacteria are killed by pasteurization, but those are the numbers you are looking at, 100,000 bacterial cells in a sample not much bigger than a tic tac is in the normal range. Not all of them will be friendly bacteria all the time.

Please let me know if there is anything else I can do.

Jane

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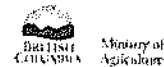
**From:** Dennett, Thom AGRI:EX  
**Sent:** Tuesday, January 2, 2018 4:27 PM  
**To:** Pritchard, Jane AGRI:EX  
**Cc:** Anslow, Martha AGRI:EX  
**Subject:** Briefing materials about raw milk

Hi Jane,

I have been asked to write a briefing note for our minister on the topic of raw milk. I understand from Lorie Hrycuik, that you may already have briefing information on raw milk. I was wondering if you could please send me any information used for briefing or summaries that you already have on the topic?

Thanks,

Thom Dennett | Policy Analyst  
Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
PO Box 9120 Stn Prov Gov, Victoria BC V3G 2M3  
[thomas.dennett@gov.bc.ca](mailto:thomas.dennett@gov.bc.ca) | (250) 356-1671



**Hare, Lynette E AGRI:EX**

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**Thom Dennett** | Policy Analyst  
Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
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[thomas.dennett@gov.bc.ca](mailto:thomas.dennett@gov.bc.ca) | (250) 356-1671



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Inter-Ministry Agriculture, Environment and Health ADMs' Committee: Projects Portfolio – Draft for the February, 2017 meeting

On-Going Projects					
Topic Area	Project Title & Lead(s)	Project Description	Status	Completion Date	Next Steps or Completed Outcomes
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HEALTHY FOOD	Raw Milk HLTH: Tim Lambert	Food safety concerns associated with raw milk.	Ongoing issue  ADM Cmte updated at the February 9, 2016 meeting.	n/a	None indicated at that time.
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**Inter-Ministry Agriculture, Environment and Health ADMs' Committee: Projects Portfolio – Draft for the February, 2017 meeting**

<b>Staff Membership List</b>			
<b>Ministry of Health</b>			
<b>Lorrie Cramb</b>	Provincial Dietitian, Healthy Living and Health Promotion Branch	<b>Anna Wren</b>	Healthy Eating and Nutrition Policy Manager, Healthy Living and Health Promotion Branch
<b>Terry Oh</b>	Policy Analyst, Food Protection		
<b>Ministry of Environment</b>			
<b>Margaret Crowley</b>	Agriculture Environmental Specialist, Environmental Standards Branch	<b>Chris Jenkins</b>	Director, Clean Technologies, Environmental Standards Branch
<b>Ministry of Agriculture</b>			
<b>TJ Schur</b>	Director, Industry Development	<b>Barb Tierney</b>	Policy Analyst, Corporate Governance, Policy and Legislation Branch
<b>BC Centre for Disease Control</b>			
<b>Lynn Wilcott</b>	A/Program Director, Food Protection Services		

## ADM Transition Summary

### Overview:

- My flights are leaving January 2<sup>nd</sup> and returning to Victoria Wednesday January 24<sup>th</sup> (4:48PM).
- I tentatively booked Thursday and Friday off (25<sup>th</sup> and 26<sup>th</sup>) but may come in.
- My intent is to let Lorie be the ADM and not insert myself in files while I am away
  - I will have intermittent access to e-mails, so can answer questions but with a delay
  - Cell phone (250-415-1762) should work and is best for emergencies.
  - I'll be turning data off of my cell which I think will mean texts won't come through.
- There are some scheduling issues in January – largely Minister meetings while Minister is on vacation. I've asked that these get clarified but have included them below as well in case.
- Note that the Minister is away Jan. 7<sup>th</sup> to 20<sup>th</sup>

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- Minister briefing on Raw Milk
  - Currently Jan 22<sup>nd</sup>. I'm asking for this to get delayed until I am back.
  - If not, we need to make sure the brief includes Health on the science first.

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Inter-Ministry Agriculture, Environment and Health ADMs' Committee: Projects Portfolio – revised: July 7, 2016 for the July 12, 2016 meeting

Current Agenda Topics					
Topic Area	Project Title & Lead(s)	Project Description	Progress to Date	Completion Target Date	Next Steps or Completed Outcomes
ENVIRONMENTAL EMERGENCY MANAGEMENT	<b>Canadian Food Inspection Agency (CFIA) MOU</b>  AGRI: Jane Pritchard  HLTH:	CFIA Western Region is working towards a modified/generic FADES plan consistent across the provinces with appendices/ annexes relevant to each province, building from the BCFADES document. CFIA Western Region is leading the review process for an MOU, with AGRI and ENV to be engaged for feedback.	Provinces have requested more detail be drafted into the MOU or annexes.	ongoing	CFIA meets with Health and AGRI on June 15. AGRI and Health will provide an update to the Committee.
	<b>FADES – Foreign Animal Disease Emergency Support Plan</b>  AGRI: Jane Pritchard/ Clayton Botkin ENV: Margaret Crowley	The purpose of the FADES Plan is to provide an agreement whereby federal and provincial agencies accept responsibilities for collaborative response to a foreign animal disease event in British Columbia.	The Plan had not been reviewed since 2012. However, during the December 2014 Avian Influenza (AI) outbreak, an amendment was made to Protocol #2 (out-of barn biological heat treatment) by a JEOC Record of Decision. As a result, possible changes to the Protocols were proposed.	On hold till MOU process completed.	Canadian Food Inspection Agency (CFIA) is seeking to have bilateral umbrella Memoranda of Understanding signed with each province and territory.

Inter-Ministry Agriculture, Environment and Health ADMs' Committee: Projects Portfolio – revised: July 7, 2016 for the July 12, 2016 meeting

Current Agenda Topics					
Topic Area	Project Title & Lead(s)	Project Description	Progress to Date	Completion Target Date	Next Steps or Completed Outcomes
<b>SALMONELLA ENTERITIDIS (SE)</b>	<b>SE Food Safety Working Group</b>  AGRI: Gavin Last  HLTH: Tim Lambert	First Meeting occurred Wednesday Oct 23, 2015.	Terms of Reference have been developed. Working Group are meeting regularly to develop strategy.	January 2017	Strategy will be developed, with work plan with 3, 6, and 9 month milestones provided at the next ADM Committee meeting.  Funding proposal to be developed to support mitigation strategies. In addition, WG will provide ADM Committee with a list of prioritized actions it will take over the next year.
<b>FISH &amp; SEAFOOD</b>	<b>Seafood Inspections of provincially licensed facilities:</b>  AGRI: Gavin Last	Roles and Responsibilities for inspection of Provincially Licensed Seafood Processing facilities.	Presentation to two Regional Health Authority Directors undergone. AGRI is working with HLTH to develop presentation for Regional Health Authorities Directors Policy Committee.	ongoing	Confirm materials and date for presentation to the Regional Health Authorities Directors Policy Committee.

Inter-Ministry Agriculture, Environment and Health ADMs' Committee: Projects Portfolio – revised: July 7, 2016 for the July 12, 2016 meeting

On Going Projects - not on Current ADM Agenda					
Topic Area	Project Title & Lead(s)	Project Description	Status	Completion Date	Next Steps or Completed Outcomes
HEALTHY FOOD	Raw Milk HLTH: Tim Lambert	Food safety concerns associated with raw milk.	Ongoing issue	n/a	Update report to the February 9, 2016 ADM Committee

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Inter-Ministry Agriculture, Environment and Health ADMs' Committee: Projects Portfolio – revised: July 7, 2016 for the July 12, 2016 meeting

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Topic Area	Project Title & Lead(s)	Project Description	Status	Completion Date	Next Steps or Completed Outcomes
ENVIRONMENTAL REGULATORY REVIEWS	<b>Open Burning Smoke Control Regulation</b>  ENV: Markus Kellerhals AGRI: Joan Easton	ENV is updating the OBSCR, which had some potential implications for agriculture, mainly tree fruit growers.	ENV and AGRI have reached a compromise on provisions dealing with burning 'prunings' and 'clearing' waste.  Proposed amendments are in the drafting stage.	<b>Late 2016 enactment - most likely 2017.</b>	ENV has released a policy update describing the proposed regulatory changes. It is currently open for comment. AGRI staff will continue to be engaged as drafting proceeds so they can advise on any potential issues for the sector. Policy paper is posted at <a href="http://www.env.gov.bc.ca/epd/codes/open_burning/">http://www.env.gov.bc.ca/epd/codes/open_burning/</a>
ENVIRONMENTAL REGULATORY REVIEWS	<b>Agricultural Waste Control Regulation (AWCR) Review</b>  ENV: Chris Jenkins, Margaret Crowley, Michael Schwalb AGRI: Dave Poon, John Luymes	ENV reviewing the AWCR to update and improve the 24-year-old regulation. Using an Industry Working Group (AgWG) approach to consult on proposed amendments that meet both the desired outcomes for ENV and agricultural operators.	A policy finalization document was prepared with input from AGRI staff. This document was distributed to the industry working group on May 30, 2016.	<b>2016</b>	The industry working group will be meeting on June 17, 2016 to review the policy finalization document. Feedback and suggestions arising from the meeting will inform the drafting instructions phase of the review process. A proposed revised regulation is targeted for end of 2016.

Inter-Ministry Agriculture, Environment and Health ADMs' Committee: Projects Portfolio – revised: July 7, 2016 for the July 12, 2016 meeting

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Topic Area	Project Title & Lead(s)	Project Description	Status	Completion Date	Next Steps or Completed Outcomes
FOOD SAFETY INCENTIVE PROGRAMS FOR PRODUCERS AND PROCESSORS	On-farm food safety (OFFS)  AGRI: Alison Speirs	The objective of the OFFS Program is to ensure that foods produced in BC are among the safest both nationally and internationally by encouraging agri-food producers to adopt good agricultural practices (GAPs) for food safety and recognized Hazard Analysis Critical Control Plan (HACCP)-based on-farm food safety assurance systems in their operations.	This project began June 2014, and is funded under Growing Forward 2.	March 2016	OFFS program was successfully implemented in 2014 with targets on track. Program evaluation and planning for 2015 underway.  OFFS and Traceability RFP closed May 2016.
FOOD SAFETY INCENTIVE PROGRAMS FOR PRODUCERS AND PROCESSORS	Post-farm food safety (PFFS)  AGRI: Navneet Gill	The objective of the PFFS Program is to ensure that foods processed in BC are among the safest both nationally and internationally – the PFFS program provides educational opportunities and financial incentives for BC food processors to adopt HACCP-based good manufacturing practices in preparation for food safety certification.	This project began July 2014, and is funded under Growing Forward 2.	March 2016	PFFS program was successfully implemented in 2014 with targets on track. Program evaluation and planning for 2015 is underway.  PFFS and Traceability RFP closed May 2016. Finalizing contract with successful proponent.
HEALTHY EATING AND FOOD SECURITY	Farmers' Market Nutrition Coupon Program (FMNCP)  HLTH: Margaret Yandel AGRI: Brenda Lennox	An initiative of the BC Association of Farmers' Markets in partnership with farmers' markets and community skill building organization. Funded by HealthyFamiliesBC, this program provides lower income pregnant women, families with children and seniors with access to locally produced BC food.	FMNCP pilot (2007-2009) was revitalized and expanded in 2012-2014. Funding for operations at 2014 levels secured until 2017.	Fall 2017	2015 stats: 49 farmers' markets in 47 communities; 848 farmers; and 79 community skills building programs. Reach: 3500 households, 10,000 people; \$560,000 in redeemed coupons went directly to local farmers. -FMNCP Evaluation Season 3, 2014 is available.

On Going Projects - not on Current ADM Agenda					
Topic Area	Project Title & Lead(s)	Project Description	Status	Completion Date	Next Steps or Completed Outcomes
HEALTHY EATING AND FOOD SECURITY	<p><b>BC School Fruit and Vegetable Nutritional Program (BCSFVNP)</b></p> <p>HLTH: Christie Docking AGRI: Brenda Lennox</p>	<p>A program managed by the BC Agriculture in the Classroom Foundation and funded by the Ministry of Health as part of HealthyFamiliesBC. Partnership includes Ministries of Health, Agriculture and Environment as well as industry.</p> <p>The program aims to improve the nutritional health of BC students by delivering fresh BC fruits, vegetables, milk and healthy eating resources directly to BC public and First Nations schools every 2<sup>nd</sup> week throughout the school year.</p>	<p>Celebrating its 10<sup>th</sup> year this school year (2015/16), the program reaches 550,000 students in 1464 schools in all regions of BC.</p> <p>Program enhancements include milk for children in K-2 and the Fresh to You Fundraiser where students sell seasonal BC produce bundles to raise funds for their school.</p>	Ongoing. Current funding will maintain the program until 2017	<p>Continue delivering program to all enrolled schools. 22 new schools enrolled this year, bringing the total to nearly 90% of public and First Nations schools.</p> <p>Plans to continue to build on the initial success of the fundraiser, expanding to new schools.</p>
HEALTHY EATING AND FOOD SECURITY	<p><b>Farm to School</b></p> <p>HLTH: Christie Docking AGRI: Brenda Lennox</p>	<p>Farm to School brings healthy, local food into schools and provides students with hands-on learning opportunities that foster food literacy. The program strengthens the local food system and enhances school and community connectedness.</p> <p>Farm to School is managed by the Public Health Association of BC and funded by the Ministry of Health as part of HealthyFamiliesBC.</p>	<p>Farm to School programs will be operating in 126 schools in every region of BC by the end of the 2015/16 school year, serving approx. 35,000 students.</p> <p>Three new Regional Hubs were developed in 2014 to support new and existing Farm to School programs. This allows for economies of scale, a point of contact for regional cooperation/partnerships, and regional sustainability.</p>	Current funding until June 2016	Existing and new Farm to School programs will continue to be supported by the provincial manager, regional leaders, a provincial advisory committee and the Regional Hubs over this school year. An evaluation of the new Regional Hubs will be completed by June 2016.

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Inter-Ministry Agriculture, Environment and Health ADMs' Committee: Projects Portfolio – revised: July 7, 2016 for the July 12, 2016 meeting

<b>COMPLETED PROJECTS</b>					
<b>Topic Area</b>	<b>Project Title &amp; Lead(s)</b>	<b>Project Description</b>	<b>Final Stage</b>	<b>Completion Date</b>	<b>OUTCOMES</b>
<b>FISH &amp; SEAFOOD</b>	<b>MOU for Fish Inspection</b>  HLTH: <b>Carrie Cotton</b>	The MOU replaces the CANADA- BC MOU ON COORDINATION OF FISH INSPECTION PROGRAMS, 1991; between Canada, Department of Fisheries and Oceans; B.C. Ministry of Agriculture, Fisheries and Food; and B.C. Ministry of Health. The purpose of this new MOU is to identify and clarify the Parties' respective roles regarding Fish Inspection Programs and to review issues that may arise from time to time and develop procedures and coordinated responses for dealing with them.	Complete with final signatures being sought.	<b>Complete July 2014</b>	All signatures achieved in June/July 2014.
<b>FISH &amp; SEAFOOD</b>	<b>Listeria in Fish Processing Plants</b>	The Listeria Working Group (including HLTH, AGRI, BCCDC) formed to respond to finding from a 2009 investigation that reported high levels of Listeria in provincial fish plants. The WG's report was completed in 2012.	The risk ranking tool proposed in the report was used to evaluate provincially inspected fish plants in 2013.	<b>Inspections were completed in December 2013</b>	This issue is deferred to the Joint AGRI/HLTH Food Safety Policy Committee
<b>FOOD SAFETY HAZARD ANALYSIS AND RISK ASSESSMENT</b>	<b>AGRI food safety in collaboration with RHAs</b>  AGRI: <b>Allison Speirs</b>	Survey of irrigation source waters for pathogenic bacteria. Long term goal is to develop best irrigation practices for producers that minimize the risk of foodborne illness on fresh fruits and vegetables.	Project is in collaboration with UBC and began Sept 2014. This project builds on the study conducted in 2004 by ENV, and by AGRI from 2012-2013.	<b>Completed</b>	

Inter-Ministry Agriculture, Environment and Health ADMs' Committee: Projects Portfolio – revised: July 7, 2016 for the July 12, 2016 meeting

COMPLETED PROJECTS					
Topic Area	Project Title & Lead(s)	Project Description	Final Stage	Completion Date	OUTCOMES
HEALTHY EATING AND FOOD SECURITY	Food Security Evidence Review Paper and Model Core Program Paper  HLTH: Margaret Yandel/ Lorrie Cramb	The 2013 Food Security Evidence Review describes the evidence on public health interventions that address food security at the individual, household, and community level, within the context of provincial and national policies. It identifies effective measures for improving access to, and availability of, healthy, culturally appropriate food within communities. The evidence review informs the core model program paper.  The core model program paper is a resource to Health Authorities and assists with determining what they are able to do to address food security.	The 2014 core model program paper was approved by the Provincial Public Health Committee Sept 2014.	Completed	The 2013 evidence review and 2014 core model program paper have been posted on the Ministry of Health Website: <a href="http://www2.gov.bc.ca/gov/top/ic.page?id=BC835EBA54E549E9B4F804EE7E54D8EE">http://www2.gov.bc.ca/gov/top/ic.page?id=BC835EBA54E549E9B4F804EE7E54D8EE</a>
HEALTHY EATING AND FOOD SECURITY	Food Systems in Remote First Nations (FNFS)  HLTH: Lorrie Cramb/Marg Yandel AGRI: Erica Nitche	\$700,000 funding over 2 years (2012-14) provided to Heart and Stroke Foundation to provide further agricultural support to 15 of the 17 First Nation community gardens that participated in the PAI (news release Nov 2012).	FNFS completed. Community food plans were developed in 6 communities.  Final project report with evaluation will be available fall 2014.	Completed	This project is now funded by the First Nations Health Authority. \$1.3 million was granted to the HSF to continue and expand upon this program.

Inter-Ministry Agriculture, Environment and Health ADMs' Committee: Projects Portfolio – revised: July 7, 2016 for the July 12, 2016 meeting

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HEALTHY EATING AND FOOD SECURITY	Community Food Action Initiative evaluation  HLTH: Marg Yandel /Lorrie Cramb		Focus testing and amending a national toolkit to evaluate community food security activities - In partnership with Provincial Health Services Authority.	April 2012	Report for the focus testing was completed. No further action is planned.
SALMONELLA ENTERITIDIS	Paper on <i>Salmonella enteritidis</i> (SE) in Eggs  HLTH: Carrie Cotton  AGRI: Dr. Jane Pritchard	ADMs requested a collaborative HLTH/AGRI strategy document on the rising incidence of SE; including recommendations for the reduction or prevention of SE in BC eggs.	BCCDC and AGRI participated on behalf of BC on a national SE and Eggs Task force to assess the rising incidence of SE across Canada.  HLTH participated in an AGRI-led SE workshop on poultry and human health. (2013 02 7).  BCCDC surveillance data for 2014 human SE illnesses rose to an estimated 13.6 cases/100,000 population, indicating the start of the second SE outbreak.	Papers completed Feb 2013 and submitted to HLTH/AGRI ADMs	This issue is deferred to the Joint AGRI/HLTH Food Safety Policy Committee.

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Ministry of Health			
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Carrie Cotton	Food Policy and Program Specialist, Food Protection	Terry Oh	Policy Analyst, Food Protection
Ministry of Environment			
Margaret Crowley	Agriculture Waste Specialist, Environmental Standards Branch	Chris Jenkins	Manager, Clean Technologies, Environmental Standards Branch
Ministry of Agriculture			
Ken Nickel	Director, Sustainable Agriculture Management Branch	Rebecca Salpeter	Policy Analyst, Corporate Governance, Policy and Legislation Branch
BC Centre for Disease Control			
Lynn Wilcott	A/Program Director, Food Protection Services		



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<b>FISH &amp; SEAFOOD</b>	<b>Seafood Inspections of provincially licensed facilities:</b>  AGRI: Gavin Last	Roles and Responsibilities for inspection of Provincially Licensed Seafood Processing facilities.	Presentation to two Regional Health Authority Directors undergone. AGRI is working with HLTH to develop presentation for Regional Health Authorities Directors Policy Committee.	ongoing	Confirm materials and date for presentation to the Regional Health Authorities Directors Policy Committee.
<b>SALMONELLA ENTERITIDIS (SE)</b>	<b>SE Food Safety Working Group</b>  AGRI: Gavin Last HLTH: Tim Lambert	First Meeting occurred Wednesday Oct 23, 2015.	Terms of Reference have been developed. Working Group are meeting regularly to develop strategy.	January 2017	Strategy will be developed, with work plan with 3, 6, and 9 month milestones provided at the next ADM Committee meeting.  Funding proposal to be developed to support mitigation strategies. In addition, WG will provide ADM Committee with a list of prioritized actions it will take over the next year.

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<b>ENVIRONMENTAL EMERGENCY MANAGEMENT</b>	<b>FADES – Foreign Animal Disease Emergency Support Plan</b>  AGRI: Jane Pritchard/ Clayton Botkin ENV: Margaret Crowley	The purpose of the FADES Plan is to provide an agreement whereby federal and provincial agencies accept responsibilities for collaborative response to a foreign animal disease event in British Columbia.	The Plan had not been reviewed since 2012. However, during the December 2014 Avian Influenza (AI) outbreak, an amendment was made to Protocol #2 (out-of barn biological heat treatment) by a JEOC Record of Decision. As a result, possible changes to the Protocols were proposed.	On hold till MOU process completed.	Canadian Food Inspection Agency (CFIA) is seeking to have bilateral umbrella Memoranda of Understanding signed with each province and territory.
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		Farm to School is managed by the Public Health Association of BC and funded by the Ministry of Health as part of HealthyFamiliesBC.	The Regional Hub model developed in 2014 has proven successful in providing economies of scale, a point of contact for regional cooperation/partnerships, and regional sustainability.		
HEALTHY FOOD	Raw Milk HLTH: Tim Lambert	Food safety concerns associated with raw milk.	Ongoing issue	n/a	Update report to the February 9, 2016 ADM Committee

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<b>COMPLETED PROJECTS</b>					
<b>Topic Area</b>	<b>Project Title &amp; Lead(s)</b>	<b>Project Description</b>	<b>Final Stage</b>	<b>Completion Date</b>	<b>OUTCOMES</b>
<b>FISH &amp; SEAFOOD</b>	<b>MOU for Fish Inspection</b>  HLTH: Carrie Cotton	The MOU replaces the CANADA- BC MOU ON COORDINATION OF FISH INSPECTION PROGRAMS, 1991; between Canada, Department of Fisheries and Oceans; B.C. Ministry of Agriculture, Fisheries and Food; and B.C. Ministry of Health. The purpose of this new MOU is to identify and clarify the Parties' respective roles regarding Fish Inspection Programs and to review issues that may arise from time to time and develop procedures and coordinated responses for dealing with them.	Complete with final signatures being sought.	<b>Complete July 2014</b>	All signatures achieved in June/July 2014.
<b>FISH &amp; SEAFOOD</b>	<b>Listeria in Fish Processing Plants</b>	The Listeria Working Group (including HLTH, AGRI, BCCDC) formed to respond to finding from a 2009 investigation that reported high levels of Listeria in provincial fish plants. The WG's report was completed in 2012.	The risk ranking tool proposed in the report was used to evaluate provincially inspected fish plants in 2013.	<b>Inspections were completed in December 2013</b>	This issue is deferred to the Joint AGRI/HLTH Food Safety Policy Committee.
<b>FOOD SAFETY HAZARD ANALYSIS AND RISK ASSESSMENT</b>	<b>AGRI food safety in collaboration with RHAs</b>  AGRI: Alison Speirs	Survey of irrigation source waters for pathogenic bacteria. Long term goal is to develop best irrigation practices for producers that minimize the risk of foodborne illness on fresh fruits and vegetables.	Project is in collaboration with UBC and began Sept 2014. This project builds on the study conducted in 2004 by ENV, and by AGRI from 2012-2013.	<b>Completed</b>	

Inter-Ministry Agriculture, Environment and Health ADMs' Committee: Projects Portfolio – Draft for the January, 2017 meeting

COMPLETED PROJECTS					
Topic Area	Project Title & Lead(s)	Project Description	Final Stage	Completion Date	OUTCOMES
HEALTHY EATING AND FOOD SECURITY	Food Security Evidence Review Paper and Model Core Program Paper  HLTH: Margaret Yandel/ Lorrie Cramb	The 2013 Food Security Evidence Review describes the evidence on public health interventions that address food security at the individual, household, and community level, within the context of provincial and national policies. It identifies effective measures for improving access to, and availability of, healthy, culturally appropriate food within communities. The evidence review informs the core model program paper.  The core model program paper is a resource to Health Authorities and assists with determining what they are able to do to address food security.	The 2014 core model program paper was approved by the Provincial Public Health Committee Sept 2014.	Completed	The 2013 evidence review and 2014 core model program paper have been posted on the Ministry of Health Website: <a href="http://www2.gov.bc.ca/gov/top/ic.page?id=BC835EBA54E549E9B4F804EE7E54D8EE">http://www2.gov.bc.ca/gov/top/ic.page?id=BC835EBA54E549E9B4F804EE7E54D8EE</a>
HEALTHY EATING AND FOOD SECURITY	Food Systems in Remote First Nations (FNFS)  HLTH: Lorrie Cramb/Marg Yandel AGRI: Erica Nitche	\$700,000 funding over 2 years (2012-14) provided to Heart and Stroke Foundation to provide further agricultural support to 15 of the 17 First Nation community gardens that participated in the PAI (news release Nov 2012).	FNFS completed. Community food plans were developed in 6 communities.  Final project report with evaluation will be available fall 2014.	Completed	This project is now funded by the First Nations Health Authority. \$1.3 million was granted to the HSF to continue and expand upon this program.



**Inter-Ministry Agriculture, Environment and Health ADMs' Committee: Projects Portfolio – Draft for the January, 2017 meeting**

<b>COMPLETED PROJECTS</b>					
<b>Topic Area</b>	<b>Project Title &amp; Lead(s)</b>	<b>Project Description</b>	<b>Final Stage</b>	<b>Completion Date</b>	<b>OUTCOMES</b>
<b>HEALTHY EATING AND FOOD SECURITY</b>	<b>Community Food Action Initiative evaluation</b>  HLTH: Marg Yandel /Lorrie Cramb		Focus testing and amending a national toolkit to evaluate community food security activities - In partnership with Provincial Health Services Authority.	<b>April 2012</b>	Report for the focus testing was completed. No further action is planned.
<b>SALMONELLA ENTERITIDIS</b>	<b>Paper on <i>Salmonella enteritidis</i> (SE) in Eggs</b>  HLTH: Carrie Cotton  AGRI: Dr. Jane Pritchard	ADMs requested a collaborative HLTH/AGRI strategy document on the rising incidence of SE; including recommendations for the reduction or prevention of SE in BC eggs.	BCCDC and AGRI participated on behalf of BC on a national SE and Eggs Task force to assess the rising incidence of SE across Canada.  HLTH participated in an AGRI-led SE workshop on poultry and human health. (2013 02 7).  BCCDC surveillance data for 2014 human SE illnesses rose to an estimated 13.6 cases/100,000 population, indicating the start of the second SE outbreak.	Papers completed Feb 2013 and submitted to HLTH/AGRI ADMs	This issue is deferred to the Joint AGRI/HLTH Food Safety Policy Committee.

**Inter-Ministry Agriculture, Environment and Health ADMs' Committee: Projects Portfolio – Draft for the January, 2017 meeting**

Staff Membership List			
<b>Ministry of Health</b>			
<b>Lorrie Cramb</b>	Provincial Dietitian, Healthy Living and Health Promotion Branch	<b>Anna Wren</b>	Healthy Eating and Nutrition Policy Manager, Healthy Living and Health Promotion Branch
<b>Terry Oh</b>	Policy Analyst, Food Protection		
<b>Ministry of Environment</b>			
<b>Margaret Crowley</b>	Agriculture Environmental Specialist, Environmental Standards Branch	<b>Chris Jenkins</b>	Director, Clean Technologies, Environmental Standards Branch
<b>Ministry of Agriculture</b>			
<b>Ken Nickel</b>	Director, Sustainable Agriculture Management Branch	<b>Rebecca Salpeter</b>	Policy Analyst, Corporate Governance, Policy and Legislation Branch
<b>BC Centre for Disease Control</b>			
<b>Lynn Wilcott</b>	A/Program Director, Food Protection Services		

**Hare, Lynette E AGRI:EX**

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**From:** Tierney, Barbara Ann AGRI:EX  
**Sent:** Thursday, January 5, 2017 2:28 PM  
**To:** Last, Gavin AGRI:EX; Poon, David AGRI:EX; Luymes, John AGRI:EX; Easton, Joan E AGRI:EX; Pritchard, Jane AGRI:EX; Botkin, Clayton AGRI:EX; Speirs, Alison AGRI:EX; Speirs, Alison AGRI:EX; Anderson, Heather L AGRI:EX; Nitchie, Erica AGRI:EX; Nickel, Ken AGRI:EX; Raymond, Mark AGRI:EX  
**Cc:** Shaw, Emily FIN:EX; Hrycuik, Lorie AGRI:EX  
**Subject:** ADM Project Portfolio for review and updates  
**Attachments:** ADM - Projects Portfolio - Draft for Jan 2017 meeting.docx  
  
**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Good afternoon,

Happy New Year – I wish you all of the best in this coming year.

Attached is the Inter-Ministry - Agriculture, Environment and Health ADMs' Committee: Projects Portfolio for updating. s.22

In tracked changes, could you please update the projects where you are listed as a lead– any additional new projects or changes to existing ones.

They are sorted in 3 sections – ones that would be on a current agenda, those that are ongoing but no discussion/decision needed at the time, and those completed.

Could you please send any changes or updates to me, in tracked changes, by the end of day on **Wednesday, January 18, 2017**.

If you notice that someone is missing from the list, please let me know.

If you have any questions, please do not hesitate to contact me.

Thanks,

Barb

Policy Analyst  
Corporate Governance, Policy and Legislation Branch  
Ministry of Agriculture  
[BarbaraAnn.Tierney@gov.bc.ca](mailto:BarbaraAnn.Tierney@gov.bc.ca)  
250.356.1686



Ministry of  
Agriculture

PO Box 9120 Stn Prov Gov, Victoria BC V8W 9B4



## Should cow share program be a legal option for unpasteurized milk access in B.C.?

Cliff – 170431

- Public Health Act for the province of BC states that "Milk for human consumption that has not been pasteurized at a licensed dairy plant in accordance with the Milk Industry Act is prescribed as a health hazard. It also states that "A person must not willingly cause a health hazard, or act in a manner that the person knows or ought to know, will cause a health hazard."
- Under the Milk Industry Act for the province of BC, a producer must not sell raw milk to anyone except a licensed dairy plant. Also, only a licensed Bulk Tank Milk Grader is allowed to remove the milk from the farm bulk tank to another location.
- Recent judgment in Ontario, which has different legislation in this area, acquitted Mr. Schmidt on similar charges as the recent case in BC against Alice Jongerden carrying on business as Home on the Range. The Home on the Range operation was being run as a cow share, but also was distributing raw milk. Under our legislation in BC, the ruling went against the sale and/or distribution of raw milk.
- We have clear legislation based on scientific findings that prohibit the sale of raw milk. The loop-hole is that if you own the cow you are not selling the milk. We do not legislate against dairy owners drinking the milk they produce as a raw product on their own farms, in their own homes. This would be impossible to regulate.
- The main diseases that initially necessitated pasteurizing raw milk have largely been controlled in the animal populations. These were Tuberculosis and Brucellosis. These were very serious diseases and caused significant disease and death in humans drinking the milk. The introduction of pasteurization revolutionized the safety of milk.
- These diseases have been replaced by new ones that we struggle to control in the animal population. These new diseases are *E.coli* O157:H7 causing Hemolytic Uremic Syndrome (HUS) or Hamburger disease, Salmonellosis, and Campylobacteriosis. These are known to be transmitted through raw cow milk.
- As we also have sheep and goat dairies in the province, it should be mentioned that in addition to the above mentioned diseases, these species also present an increased risk of transmission of Listeriosis (Maple Leaf meats) and Toxoplasmosis.
- Clinical signs of disease are often not observed in cows infected with these diseases. Cows can shed the disease causing organism intermittently and they can be transiently infected. This means it is almost impossible to predict if a dairy cow is carrying and shedding the organisms that cause these serious diseases in humans.
- As a regulator of milk quality and safety, it would be impossible to regulate and truly guarantee the safety and quality in raw milk because of the variability in each and every product. There is no way to guarantee every liter of raw milk is clean of the micro-organisms that transmit diseases without extensive, expensive and tedious testing

## Should cow share program be a legal option for unpasteurized milk access in B.C.?

Cliff – 170431

### Background on the Weston A Price Foundation (WAPF),

This is the organization which is asking the question. Information available on their web site indicates that there is likely no room to debate this issue with them. There is possibly no science you could present to support an alternate answer that would be appreciated.

The WAPF is known for its positive stance towards the consumption of saturated fats and cholesterol from traditional foods<sup>[13]</sup>, its support of local food and farms, and its opposition to veganism and some aspects of vegetarianism.

The Weston A Price Foundation is dedicated to restoring nutrient-dense foods to the human diet through education, research and activism. It supports a number of movements that contribute to this objective including accurate nutrition instruction, organic and biodynamic farming, pasture-feeding of livestock, community-supported farms, honest and informative labelling, prepared parenting and nurturing therapies. Specific goals include establishment of universal access to clean, certified raw milk and a ban on the use of soy formula for infants.

The Weston A. Price Foundation is a non-profit, tax-exempt charity founded in 1999 to disseminate the research of nutrition pioneer Dr. Weston Price, whose studies of isolated non-industrialized peoples established the parameters of human health and determined the optimum characteristics of human diets. Dr. Price's research demonstrated that humans achieve perfect physical form and perfect health generation after generation only when they consume nutrient-dense whole foods and the vital fat-soluble activators found exclusively in animal fats.

The Weston A. Price Foundation posts a list on line of where to find Real (Raw) milk in BC.  
[www.realmilk.com/where-other.html](http://www.realmilk.com/where-other.html)

October 21, 2010

- The Public Health Act for the province of BC states that "Milk for human consumption that has not been pasteurized at a licensed dairy plant in accordance with the Milk Industry Act is prescribed as a health hazard. It also states that "A person must not willingly cause a health hazard, or act in a manner that the person knows or ought to know, will cause a health hazard." This Act was fully supported into legislation by the province of BC. Unless it changes, raw milk is not allowed to be distributed and marketed.
- It is the Ministry of Healthy Living and Sport which is responsible for this legislation. There is well documented science to support them taking this position. Similar science and the wish of the general public to be protected against these risks, justifies keeping *Listeria* spp. bacteria out of luncheon meat, *Salmonella* out of eggs, and *E. coli* O157:H7 out of hamburger and off of leafy green vegetables.
- The Ministry Of Agriculture and Lands in BC is responsible for licensing Dairies that provide milk under a regulated, hygienic and inspected system to licensed Dairy Processing Plants. This authority is under the Milk Industry Act and its Regulations. We do not regulate the sale and distribution of any products directly to the public. This is under the jurisdiction of the Ministry of Healthy Living and Sport.
- Under the Milk Industry Act for the province of BC, a licensed dairy producer must not sell raw milk to anyone except a federally or provincially licensed dairy plant. Also, only a licensed Bulk Tank Milk Grader is allowed to remove the milk from the farm bulk tank and move it to another location.
- The province does not legislate what the owner of a dairy animal may or may not do with the milk produced by that animal if it is not leaving the premises. The province does prevent that person from marketing and distributing raw unregulated milk to others for human consumption.
- 
- In the recent case in BC against Alice Jongerden her Home on the Range operation was being run as a cow share, but also was distributing the raw milk. This contravenes BC legislation. Under our legislation in BC, the ruling went against the sale and/or distribution of raw milk. This ruling did not prevent her from consuming the milk herself. Producers living on site have probably developed immunity to the local bacterial fauna through frequent exposure from other routes. Consumers having never been to the farm would not have developed the same immunity.
- 
- The main diseases that initially necessitated pasteurizing raw milk have largely been controlled in the animal populations. These were Tuberculosis and Brucellosis. These were very serious diseases and caused significant disease and death in humans drinking raw milk. The introduction of pasteurization revolutionized the safety of milk.
- These older diseases have now been replaced by new ones that we struggle to control in the animal population. The new diseases are *E.coli* O157:H7 causing Hemolytic Uremic Syndrome (HUS) or Hamburger disease, Salmonellosis, and Campylobacteriosis. These are known to be transmitted through raw milk.
- Clinical signs of these diseases are most often not observed in dairy animals infected with them. Cows can shed the disease causing organisms intermittently and they can be transiently infected while appearing at all times to be perfectly healthy. This means it is almost impossible to predict if a dairy cow is carrying and shedding the organisms that cause these serious diseases in humans.
- 
- As we also have sheep and goat dairies in the province, it should be mentioned that in addition to the above mentioned diseases, these species also present an increased risk of transmission of Listeriosis and Toxoplasmosis in raw milk.
- 
- As a regulator of milk quality and safety, it would be impossible for the Province of BC to truly guarantee the safety and quality in all raw milk due to the variability in each and every product. There is no way to guarantee every liter of raw milk is clean and free of the micro-organisms that transmit diseases without extensive, expensive, time consuming and tedious testing

**Ministry of Agriculture  
DECISION NOTE FOR ASSISTANT DEPUTY MINISTER**

Ref: 173791

Date: June 1, 2011

**Issue:** BC's position on Soft Cheese made from Raw Milk

**Background:** Starting in 2008 the Province of Quebec has permitted the production of soft cheese made from raw milk without aging. This has been in violation of the *Canadian Food and Drugs Act* and Regulation. The federal government, until recently, has not taken any action as this product's distribution was limited to the province of Quebec. As well, their inaction was also likely related to the fact that the government of Canada has been permitting this same type of product to be imported from France since 2002.

Recently, Health Canada issued a special exception to the *Canadian Food and Drug Act* Regulation (FDAR) to permit one federally-registered dairy plant in Quebec to export soft cheese made from raw milk to the rest of Canada. As well, Health Canada announced that they are proposing to amend the Canadian FDAR to permit the production of soft cheese made from raw milk without aging so that the practices currently permitted in Quebec will also comply with the Canadian FDAR. If these proposed changes are enacted, then as a result, these products would be more widely available for distribution across Canada as well as permitted to be produced in all parts of the country.

Cheese production of this type occurs primarily in small provincial-licensed dairy processing plants. These plants are licensed under the *Milk Industry Act*, which is jointly administered with Health, specifically, BCCDC administers the Processing Plant sections and so this falls to their jurisdiction. The program proposed for adoption by Quebec has intensive sampling and testing requirements which would be done on the farms supplying the raw milk for the product and so would fall under the jurisdiction of Agriculture.

**First Nations Considerations:** None

**Discussion:** BCCDC's initial response to Health Canada has been that these proposed changes to the Canadian FDAR would result in an increased risk to public health due to the lack of a 'pathogen kill' or 'control step' in the cheese production process. They are not in favor of these proposed changes to the Canadian FDAR unless additional evidence is provided to demonstrate that the pathogen control program being proposed would result in a safe product for the consumer. As a result of feedback received, Health Canada arranged with MAPAQ (Quebec's Ministry of Agriculture and Fisheries) to conduct a webinar outlining their pathogen control program and its results. The webinar was conducted on May 11 and was attended by various stakeholders including all provinces as well as representatives from both BCCDC and the BC Ministry of Agriculture.

BCCDC has drafted a response letter to the additional information provided during the webinar by MAPAQ and subsequently by Health Canada. This is embedded in this note below.

BCCDC is proposing that this letter become the basis for a joint BC provincial response (Min of Agriculture, Min of Health, BCCDC) to Health Canada regarding their proposed changes to the Canadian FDAR.

Signing the letter by both Ministries' sends the signal to Health Canada that this issue has been reviewed at a high level in the province and that there is a strong and broad consensus regarding BC's position.

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**CONFIDENTIAL  
ADVICE TO ASSISTANT DEPUTY MINISTER**

1



**Next Steps:** Communicate the level of support that Agriculture has with BCCDC and the Ministry of Health.

**Options:**

**1. Ignore the issue and deal with the required farm based milk testing requirements as they develop**

**Pros:**

- a. BCCDC and Health have more of an investment in the argument and carry a stronger voice
- b. We are unsure of the impact of a decision against their stand as far as increased resources for on farm testing.

**Cons:**

- c. If we are part of the discussion we can influence the requirements for on farm testing ensuring they would be acceptable to the Ministry and all other parties.
- d. We have invested a considerable amount of time in building strong relationships with BCCDC to have a voice in dealing with issues of zoonotic disease control. If they ask for our help, and it does not have a negative impact, it seems a win win.

**2. Watch and wait as BCCDC and Health continue to voice BC's position of opposition to legalizing the production of soft raw milk cheese within the province, adding our voice later if required.**

**Pros:**

- a. BCCDC and Health have more of an investment in the argument and carry a stronger voice

**Cons:**

- b. We have invested a considerable amount of time in building strong relationships with BCCDC to have a voice in dealing with issues of zoonotic disease control. If they ask for our help, and it does not have a negative impact, it seems a win-win.

**3. Co-sign the letter presenting stronger opposition to the suggested changes to the FDAR.**

**Pros:**

- a. The production of raw milk cheese is an area that overlaps both Health and Agriculture due to the proposed testing requirements of the raw milk on farm and increased monitoring of the farms supplying the milk. AGRI has limited resources to support our current commitment to dairy farm inspection and would be challenged if there was a big uptake on this opportunity.
- b. Strengthening the partnerships with BCCDC and Health supports our business plan goals.

**Cons:**

- c. No negative to supporting this other than standing in opposition to Quebec and Health Canada, who seem to be making a poor decision in moving towards allowing the production of a product with a known health risk.

**Recommendation:** Option #3

**Approved / Not Approved**

\_\_\_\_\_ Date Signed

Contact: Jane Pritchard, 604 556-3013

DIR PK ADM \_\_\_\_\_ DM \_\_\_\_\_

**CONFIDENTIAL**  
**ADVICE TO ASSISTANT DEPUTY MINISTER**

Dear Jeff Farber and Marie-Josée Bolduc:

Re: BC's Position- Soft Cheese Made from Raw Milk

Thank you very much for organizing the webinar with MAPAQ on May 11, 2011. It was very well organized and very informative. We appreciate all the work that the MAPAQ staff obviously put into the event. Regarding BC's position on the issue of soft cheese being produced from raw milk with no retention, our view remains the same. As a province, we do not agree with Health Canada's proposal to change the Canadian Food and Drug Act and regulations in order to permit the production of soft cheese made from raw milk without aging. The reasons are provided below:

1. Our legislation and our public health view is that raw milk is a health hazard. There is much evidence which shows that raw milk can be contaminated with pathogenic bacteria. As such, from a public health viewpoint, it should continue to be treated as a hazard. From a hazard mitigation viewpoint, our initial, basic question remains the same: Is there evidence that the process used in Quebec in the production of soft cheese using raw milk will mitigate this hazard? From the evidence provided in the webinar, our conclusion is that the answer would appear to be no. The following reasons are provided for this conclusion:
  - a. Pathogen testing of both the raw milk and the finished cheese is a large component of the Quebec program. Detection of pathogens in either the raw milk and/or the finished cheese is an important control step in the program. When pathogens are detected, the raw milk and/or the finished cheese is diverted as appropriate. However, we feel this control step is not adequate to ensure that pathogens will not be present in all cheese produced for the following reasons:
    - i. The pathogen testing is relatively infrequent. For *Listeria monocytogenes*, *E. coli*, and *S. aureus*, it is done monthly. For *Salmonella*, it is done every 3 months. Our question is: what about all the other raw milk and lots of cheese produced in between testing? One could have contaminated raw milk being produced in between tests that would go on to produce contaminated cheese. This would obviously be undetected and would go for sale to the public.
    - ii. Then there is the secondary but still very important issue of simply relying on testing to ensure a product is negative for pathogens. A negative test result does not confirm that a particular sample is free of pathogenic bacteria. I.e. A "negative" is not necessarily a "negative". There can be issues of low level contamination and/or injured cells which are not necessarily detected (or easily detectable) under routine pathogen testing. As well, there can be a lack of cheese lot homogeneity with respect to pathogen distribution. The 1985 Maritimes cheese outbreak of salmonellosis demonstrated this well in that MANY cheese samples, of what were later known to be contaminated with *Salmonella*, had to be tested before the first "positive" was found.

- iii. The program only tests for *Listeria*, *E. coli*, *S. aureus* and *Salmonella* species. While these pathogens are commonly associated with raw milk, there are several other species of pathogenic bacteria that have been found associated with raw milk. Some of these other pathogens include *Campylobacter* species and certain *Streptococcus* species as well as several others. The program, as it is designed, would not detect the presence of other species of pathogenic bacteria. As such, these species could be present undetected in the finished cheese and would go on to be consumed resulting in a high likelihood of illness.
  - b. The evidence provided during the webinar shows a pathogen contamination rate of cheeses produced from raw milk in 2010-2011 of 4.3%. We acknowledge that this is an improvement over the same cheeses produced in 2008-2009 with a contamination rate of 9.2 %. Nonetheless, we still find a pathogen contamination rate of 4.3% to be unacceptable. From a public health and disease mitigation viewpoint, we (public health) could not permit the distribution of a ready to eat food to the public knowing that the food was contaminated with pathogens at such a high frequency.
  - c. We do acknowledge that the Quebec provides some mitigation regarding the reduction of pathogen contamination in the raw milk associated with mastitis. However, the program does little to mitigate the entry of pathogens into the raw milk via other environmental sources including fecal sources.
  - d. Our current position is that since the cheese making process itself does not significantly reduce the pathogen level during processing and production of soft cheese, that making cheese with raw milk is in effect similar to drinking raw milk. The bacterial testing and other components of the mitigation program used for the production of cheese from raw milk in Quebec "may" reduce the likelihood that pathogens will be present in the finished cheese. There is, however, still a high risk that this product will be contaminated with pathogens. From a public health viewpoint, this is not acceptable. Until further evidence suggests otherwise, our view is that a proven pathogen destruction step, such as pasteurization of raw milk, should be used in the production of a high risk food such as soft cheese.
2. In BC, there is a relatively large and vocal community that is promoting the sale and consumption of raw milk. The province is currently involved in legal proceedings with individuals from this community in order to stop them from selling raw milk. The province feels that the risk of disease caused by the consumption of raw milk is sufficient to warrant the expense of pursuing this matter in the court system. The province's primary argument, from a public health viewpoint, is that raw milk has a high likelihood of containing pathogens. Consuming this product, without a pathogen elimination step, results in a high risk of disease not only to the direct consumer of the product, but also through secondary cases.

Permitting the production and sale of soft cheese made from raw milk will weaken the province's argument against the consumption of raw milk. If the Canadian Food and Drug Act and Regulations were changed as Health Canada is proposing, proponents of raw milk consumption would argue that they should also be allowed sell raw milk to the public. They would point out that because there is no pathogen elimination step in the production of soft cheese made from raw milk and that the primary pathogen control is done using testing, that they should be treated the same way. As discussed above, in the absence of a reliable pathogen elimination step, the province does not feel that pathogen testing of a food likely to contain pathogens is a verifiable or effective means of ensuring that food is free of pathogens.

3. Related to point #2 is the general public perception regarding the consumption of raw milk. The public health community provides communications and evidence to the general public that the risk of disease of consuming raw milk is high. The basic communication provided is that raw milk may contain pathogens and it should not be consumed unless it is subjected to a pathogen elimination process, such as pasteurization, in order to "make it safe". As discussed above, permitting the production of soft cheese from milk, which does not have a pathogen elimination step, will weaken public health's communications to the general public regarding the risk of consuming raw milk. Our fear is that the general public's perception regarding the risk of consuming raw milk will shift to the view that raw milk is safe to consume. If this happens, it will be very difficult to prevent the general public from accessing and consuming raw milk.
4. The MAPAQ program is resource intensive from a government viewpoint. For example, the Quebec program has an intensive on-farm code of practices for animal husbandry and milk collection that confer risk reduction steps relating to the production of raw milk. Milk is received from individual herds and tests for the herd milk and inspection by veterinarians is one of the requirements. In BC, this would be difficult to emulate as there is the practice of pooling milk from many herds. As cheese producers would likely receive milk from more than one herd, extensive testing of milk production facilities would be required in BC, making such a program very expensive from a budgetary viewpoint. From our perspective, the financial benefits of permitting the production of soft cheese made from raw milk would not equal the financial costs to government that would be required to administer this program. In today's fiscal reality, provincial government resources are stretched thin. We cannot justify the expenditure of the necessary resources that would be required to administer this program.

While there may be some economic and cultural benefits associated with the production of soft cheese made from raw milk, we feel that the risks associated with this practice far outweigh any benefits that may accrue. As such, the province of BC is opposed to Health Canada's proposed changes to the Canadian Food and Drugs Act and Regulations which would permit the production and sale of soft cheese made from raw milk. In summary, our reasons are as follows:

- The risk of disease to the public is too high.
- The proposed changes weaken the province's legal argument against the sale of raw milk
- The proposed changes also weaken the public's perception regarding the risks associated with the consumption of raw milk.
- The cost to administer this program in BC is too high.

Yours truly,  
We can decide who signs this letter