
Slaughter and Poultry Processing Industries Code of Practice – Response Form

This response form follows discussion issues outlined in the Ministry of Environment Slaughter and Poultry Processing Industries Code of Practice policy intentions paper for consultation (intentions paper). The ministry is intending to finalize and implement the code of practice by the end of June 2007.

Comments regarding the proposed intentions of the ministry are being solicited and will be carefully considered in preparing the code of practice. The ministry welcomes all suggestions with respect to potential changes discussed in the intentions paper, or other aspects of the proposed code of practice.

Comments to the ministry should be made on or before June 16, 2007, however, the ministry would appreciate receiving comments for this intentions paper by May 31, 2007.

The intentions paper, and this response form with questions based on intentions of the ministry for the proposed code of practice, have been posted on the ministry's website, see: http://www.env.gov.bc.ca/epdiv/ema_codes_of_practice/index.

Those interested are invited to submit comments on the ministry's intentions – using the instructions and questions provided on this response form. Individuals or organizations may also make written submissions to the ministry without following the format set out in the response form – as desired.

A summary report of comments and submissions received, including both printed and web-based responses, will be compiled and summarized without specific attribution by an independent contractor and posted on the ministry website. Comments received will be treated with confidentiality by ministry staff and contractors, however, comments that you provide and information that identifies you as the source of those comments may be publicly available if a Freedom of Information (FOI) request is made under the *Freedom of Information and Protection of Privacy Act*.

Following review of comments and submissions, the ministry will complete legal drafting of the code of practice for legislative review and implementation.

If you have any questions or comments, check the website address above, or contact Cindy Bertram of C. Rankin & Associates who has been contracted to manage consultation comments, at:

Email: cindybertram@shaw.ca
Mail: PO Box 5293
Victoria, B.C. V8R 6N4
Fax: (250) 598-9948

Completed response forms or submissions may be returned by any of the means listed above (email, fax or mail), or by directly submitting the web-based response form on the ministry website.

Thank you for your time and comments!

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Discussion Issues and Questions – Slaughter and Poultry Processing Industries Code of Practice

1. Scope of the proposed code of practice

The intentions paper describes a number of foundations for the scope of the proposed code of practice (see intentions paper section 4.1)

A. Review of effectiveness within five years of enactment of the proposed code

- 1.1 Do you have any comments or suggestions regarding the ministry's intention to review the code of practice for effectiveness in achieving environmental and human health objectives, and practicality, within five years of enactment?

B. Establishing a single common code for the slaughter and poultry processing industries

- 1.2 Do you have any comments or suggestions regarding the ministry's proposed intention of establishing a common code of practice for the slaughter and poultry processing industries?

C. Registration of all slaughter and poultry processing facilities licensed to sell meat

Current authorization requirements will be replaced by an expectation that all facilities licensed to sell meat register their operation with the ministry and comply with provisions of the code of practice for discharge of waste. This expectation will require an amendment to the Waste Discharge Regulation (WDR) to remove the requirement for authorization based on size of the operation. Note that additional aspects of registration are addressed in section 4.7 of the intentions paper and section 7 of this response form.

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- 1.3 Do you have any comments or suggestions regarding the ministry's expectation that all facilities licensed to sell meat register under the proposed code of practice?

D. Transition period for existing slaughter or poultry processing facilities

Owners or operators of existing facilities that do not hold permits but would be required to register under the proposed code of practice would be provided with a transition period of up to two years to achieve compliance with the code of practice.

- 1.4 Do you have any comments or suggestions regarding the proposed transition period for owners or operators of existing facilities?

E. Composting of slaughter or poultry processing wastes

The ministry intends that the composting of wastes from slaughter and poultry processing facilities be governed under the Organic Matter Recycling Regulation (OMRR).

- 1.5 Do you have any comments or suggestions regarding regulation of the composting of slaughter and poultry processing wastes?

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F. Mobile abattoirs

Mobile abattoirs would be expected to comply with applicable sections of this code of practice when disposing of wastes generated by their processes.

1.6 Do you have any comments or suggestions regarding the regulation of mobile abattoirs under the proposed code of practice?

2. Management of liquid wastes

The proposed code of practice would set standards for the discharge of wastewater from slaughter and poultry processing facilities that are typical of industry standards – in order to achieve the objective of protecting human health and the environment (see section 4.2 of the intentions paper).

The expectations for wastewater discharge in the proposed code would apply to all slaughter and poultry processing facilities, including those that employ a lagoon or manure pit and subsequently discharge or beneficially reuse treated wastewater on agricultural land. The proposed code would also prohibit direct discharge of wastewaters from slaughter and poultry processing into a watercourse or groundwater.

2.1 Do you have any general comments regarding regulation of the discharge of wastewater from slaughter or poultry processing facilities under the proposed code of practice?

A. Category A facilities

Under the proposed code, slaughter facilities processing less than 60 tonnes Live Weight Killed per year (LWK/yr) of red meat (approximately 100 cows) **or** poultry processing facilities processing less than 40 tonnes LWK/yr of poultry (approximately 20,000 birds) **and** that do not exceed a wastewater threshold of 5 m³/day at any time, would be considered Category A facilities and be expected to: ensure that wastewater discharged by the operation of the facility “does not cause pollution” (under terms of the

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EMA); maintain daily wastewater flow monitoring and records for any period in which there is a discharge; and maintain records of annual production volumes.

2.2 Do you have any comments or suggestions regarding the proposed provisions for managing liquid wastes (wastewater) from **Category A facilities**?

B. Category B facilities

Under the proposed code slaughter facilities processing 60 tonnes or more LWK/yr of red meat (approximately 100 cows) **or** poultry processing facilities processing 40 tonnes or more LWK/yr (approximately 20,000 birds) **or** that exceed a wastewater threshold of 5 m³/day at any time, would be considered Category B facilities. Owners or operators of these facilities would be expected to identify the ground disposal method(s) proposed or in use for the management of wastewater discharges – and to ensure that all associated requirements are met. Acceptable disposal methods under the proposed code would be: i) disposal by subsurface application (drain/tile field); or ii) beneficial reuse by irrigation.

i) Subsurface application (drain/tile field) of treated wastewater

Operators of slaughter and poultry processing facilities would, under the proposed code, be expected to monitor and treat all wastewater that is discharged to a drain/tile field and ensure that the wastewater does not at any time exceed: 10 mg/L FOG; 130 mg/L CBOD; and 130 mg/L TSS – and monitor these parameters on a quarterly basis. The requirement for subsurface travel time (as calculated by a qualified professional acting within their professional capacity) for discharged wastewater would not be less than ten days. Authorized wastewater treatment works in use by slaughter or poultry processing facilities prior to enactment of the proposed code of practice would not be required to meet the proposed subsurface travel time requirement, however all facilities would be expected to meet the regulatory terms set out in applicable authorizations (and to “not cause pollution” under the EMA).

2.3 Do you have any comments or suggestions regarding the proposed treatment and monitoring provisions for **subsurface application** of treated wastewater from slaughter or poultry processing facilities?

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2.4 Do you have any comments or suggestions regarding the role and appropriate qualifications of a “qualified professional” in relation to subsurface application of treated wastewater?

2.5 Do you believe that exempting authorized wastewater treatment works in use prior to enactment of the proposed code is appropriate? Do you have any comments or suggestions for the ministry?

ii) Beneficial reuse of treated wastewater by irrigation

The proposed code of practice would consider irrigation of treated wastewater generated from slaughter or poultry processing facilities to be a beneficial use and acceptable when: treated wastewater applied to land does not exceed 10 mg/L of FOG; 45 mg/L CBOD; and 60 mg/L TSS; total coliform organisms do not exceed 1,000 /100 mL and total fecal coliform organisms do not exceed 200 /100 mL; treated wastewater is not used on agricultural crops intended for human consumption; a nutrient management plan for the irrigation of treated wastewater is prepared by a qualified professional and available to the ministry within two working days of a request; and all parameters are monitored and documented before the initial discharge and at least bi-weekly (every two weeks) during the discharge period.

2.6 Do you have any comments or suggestions regarding the proposed treatment and monitoring provisions for the beneficial reuse of treated wastewater by irrigation?

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- 2.7 Do you have any comments or suggestions regarding the role or appropriate qualifications of a “qualified professional” in relation to preparation of a nutrient management plan for the beneficial reuse of treated wastewater by irrigation?

3. Landfilling of wastes

Under the proposed code of practice, the operator or owner of a facility would document information concerning proposed landfilling (burial) of slaughter or poultry processing wastes and submit a completed registration form to the ministry. Any management or other plans or assessments would be prepared and documented according to the terms set out in the proposed code, available to the ministry within two working days of a request (see intentions paper section 4.3).

A. Provisions for any proposed landfilling of slaughter or poultry processing wastes

Any landfilling of slaughter or poultry processing wastes would be expected to be undertaken within specified technical provisions, including siting, buffers, protection of groundwater, vector/pest/wildlife attraction, operational procedures, monitoring and recording, and closure.

- 3.1 Do you have any comments or suggestions regarding the proposed provisions for landfilling of slaughter or poultry processing wastes?

B. Additional provisions for proposed landfilling of slaughter or poultry processing wastes in areas with precipitation greater than 600 mm/yr

In areas with precipitation greater than 600 mm/yr, preparation and submission to a director of a groundwater protection and monitoring assessment by a qualified professional would be expected prior to *any* proposed landfilling of slaughter or poultry processing wastes.

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3.2 Do you have any comments or suggestions regarding the proposed provisions for proposed landfilling slaughter or poultry processing wastes in areas with precipitation greater than 600 mm/yr?

C. Additional provisions for proposed landfilling of greater than 5,000 kg/Ha/yr of slaughter or poultry processing wastes

Proposed landfilling of slaughter or poultry processing wastes of more than 5,000 kg/Ha/yr would be subject to additional technical provisions, including preparation and submission of a review and groundwater protection plan and closure plan by a qualified professional prior to initiation of landfilling, and additional operational procedures (described in section 4.3 C of the intentions paper).

3.3 Do you have any comments or suggestions regarding the proposed provisions for facility landfilling more than 5,000 kg/Ha/yr of slaughter or poultry processing wastes?

3.4 Do you have any comments or suggestions regarding the role or appropriate qualifications of a “qualified professional” in relation to the landfilling of slaughter or poultry processing wastes?

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4. Incineration of wastes – air emissions

The proposed code of practice would include provisions for incineration of slaughter or poultry processing waste – providing that identified air emission standards, operating procedures and monitoring and recording requirements are met (see intentions paper section 4.4).

A. Applicability of emission limits

Emission limits within the proposed code would apply to incinerators of slaughter and poultry processing waste that are either: continuous feed (for loadings up to 400 kg/hr); or batch feed (for loadings up to 400 kg per individual load). Incinerators that handle higher quantities of waste would require a permit under the EMA.

4.1 Do you have any comments or suggestions regarding the scope of the proposed code for incineration of slaughter or poultry processing waste?

B. Emission standards

The proposed emission standards (limits) authorized by the code would be 50 mg/m³ of total particulate matter and 10% opacity (see intentions paper section 4.4 B).

4.2 Do you have any comments or suggestions regarding the proposed emission standards for incineration of slaughter or poultry processing waste?

C. Operating requirements

The proposed code would require that incineration equipment be installed, operated and maintained in accordance with manufacturers' specifications, requirements and recommended procedures. Additional incineration requirements – addressing waste content, loading, design and operation of an incinerator – would also be included in the proposed code.

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4.3 Do you have any comments or suggestions regarding the proposed operating requirements for incineration of slaughter or poultry processing waste?

D. Siting requirements

4.4 Do you have any comments or suggestions regarding the proposed provisions that any incinerator be located at least 1 km from any inhabited residence and 5 km from a business, school in session, hospital or continuing care facility?

E. Monitoring and recording requirements

The ministry is seeking comment on three avenues for ensuring that emission limits are met:

- ◆ *For equipment that would not have a performance track record* – stack testing of the incinerator in operation within the first day of operation and on a periodic basis thereafter;
- ◆ *For equipment that has been used elsewhere and has some emission and performance test data* – an assessment report, signed by a qualified professional available to the ministry within two working days of a request; and/or
- ◆ *For equipment that has been used extensively elsewhere and has substantial performance and emission test data* – documentation from the manufacturer to indicate that the incineration equipment can meet ministry standards for air emissions available to the ministry within two working days of a request.

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4.5 Do you believe that any one or more of the options for ensuring that emission limits are met would not be appropriate for inclusion in the proposed code? If so, which one(s) and why?

4.6 Do you have any additional comments or suggestions for the ministry regarding appropriate avenues for ensuring that emission limits are met?

F. Proposed incineration in areas with airshed management plans or other air quality management processes

4.7 Do you have any comments or suggestions for the ministry regarding cumulative impacts of air emissions from slaughter and poultry processing facilities on an airshed-specific basis and/or provisions in the proposed code for incineration of slaughter or poultry processing waste in areas with airshed management plans or planning processes?

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5. Management of fugitive dust and odours

Owners and operators of all slaughter and poultry processing facilities will be expected under the proposed code of practice to satisfactorily manage fugitive dust and odour emissions. Inadequate control of fugitive dust and/or odour emissions could trigger a requirement for a qualified professional to prepare a fugitive dust or odour management plan (see intentions paper section 4.5).

- 5.1 Do you have any comments or suggestions regarding provisions in the proposed code for the management of odours and/or fugitive dust associated with slaughter or poultry processing facilities?

6. Monitoring and recording expectations

The proposed code would include monitoring and recording expectations associated with production level, volume, and quality of wastewater discharged, landfilling and incineration – discussed through the intentions paper and summarized in section 4.6.

The code would require facility operators to: maintain the results of any sampling conducted for a minimum of ten years; report any sampling results at the request of a director within two working days of the request; and immediately report and take corrective action in the event of any non-compliance.

The proposed code would also include the provision that sampling and analysis be carried out in accordance with procedures set out in the most recent applicable provincial field sampling manual.

- 6.1 Do you have any comments or suggestions regarding monitoring and recording provisions in the proposed code?

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7. Registration of slaughter and poultry processing facilities

Under the proposed code of practice, all slaughter and poultry processing facilities licensed to sell meat would register the facility with the ministry (see intentions paper section 4.7)

A. Proposed provisions for registration

The owner/operator of a slaughter and/or poultry processing facility would, under the proposed code, submit a registration to the ministry as per Section 4 of the Waste Discharge Regulation. Registration information would also include: known or anticipated annual production of red meat and/or poultry products from the facility (tonnes LWK/yr); known or anticipated maximum daily wastewater flow from the facility (m³/day); and acknowledgement that any applicable management plans required under provisions of the proposed code have been undertaken, documented and can be made available to the ministry within two working days of request.

7.1 Do you have any comments or suggestions regarding the proposed provisions for registration?

B. Annual fees

Provisions for annual fees for the slaughter and poultry processing industries and other activities covered by the proposed code of practice are set out in section 9 of the Waste Discharge Regulation.

7.2 Do you have any comments regarding annual fees as set out in the Waste Discharge Regulation?

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- 7.3 The ministry is supportive of efforts to reduce contaminate levels associated with slaughter and poultry processing facilities and is interested in comments regarding appropriate incentives (under the proposed code or by other regulatory means) to encourage the reduction of contaminate loading. Do you have any suggestions for the ministry in this regard?

8. Best management practices

The ministry intends to support development of best management practices (BMPs) that would provide information regarding how slaughter and poultry processing facilities can meet ministry goals for protection of human health and the environment and operate in a manner that is consistent with the *Environmental Management Act*, regulations and codes of practice (see section 5 of the intentions paper).

- 8.1 What comments or suggestions do you have for the ministry regarding the development of BMPs (e.g., existing information sources, organizations and/or agencies that could be involved)?

9. Assuring compliance and implementation

The intentions paper (see section 6) describes the ministry's intended strategy and approach to assuring compliance with the code of practice.

- 9.1 What comments or suggestions do you have for the ministry regarding appropriate and effective means for assuring compliance?

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The ministry is seeking comments and suggestions regarding administration (i.e., implementation) of the code of practice. It is important for those involved in design, operation and use of slaughter and poultry processing facilities, government staff (from the Ministry of Environment, and other agencies at provincial, federal and local levels) and other key interests to be aware of and understand the nature and provisions of the code. Information dissemination needs to be cost-effective and appropriate to the audiences involved and could include targeted workshops or presentations, printed materials and/or web-based information.

9.2 What advice or suggestions do you have for the ministry that might support effective implementation and administration of the code of practice?

10. Protection of human health and the environment

10.1 Are there any aspects of the regulation and management of waste discharges associated with slaughter or poultry processing that could significantly **affect human health or the environment** that are not, in your view, sufficiently addressed in the proposed code of practice?

- Yes
- No

If “Yes”, what are they? What suggestions do you have for the ministry to improve the manner in which these concerns are addressed?

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10.2 Do you have any other comments or suggestions for the ministry?

Thank you once more for your time and comments!

Please remember to return this response form to the ministry on or before June 16, 2007, however, the ministry would appreciate receiving comments for this intentions paper by May 31, 2007.

If you wish, you may also provide contact information on the following page. This information will be compiled separately from responses. It will be used to inform respondents of relevant postings to the ministry website.

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(Optional) Contact Information

If you wish to have your name placed on the ministry listserve to receive further information concerning the Slaughter and Poultry Processing Industries Code of Practice, please provide your contact information – **including an email address** – below. Note that all submissions will be treated with confidentiality by ministry staff and contractors, however information that identifies you as the source of those comments may be publicly available if a Freedom of Information request is made under the *Freedom of Information and Protection of Privacy Act*.

Contact Name: _____

Business or
Organization Name
(if appropriate): _____

Email: _____

Mailing address: _____

Telephone #: _____

Fax #: _____

Background and Area of Interest

Please mark an “x” in the appropriate boxes if your primary interest in the regulation relates to your:

- Work in industry:**
 - Slaughter facility
 - Poultry processing facility
 - Farm business (cattle or poultry) that does not include slaughter or poultry processing
 - Other (please describe): _____

- Work for a government regulatory agency:**
 - Federal
 - Provincial
 - Municipal

- First Nation**

- Involvement or work for an environmental or community interest group**

- Other interest**
Please describe: _____

Thank you once more for your time and interest in the development of this code of practice.

If you have any further questions, please contact Cindy Bertram at cindybertram@shaw.ca.