

**STAKEHOLDER SUBMISSIONS ON THE
BC EGG MARKETING BOARD
NEW PRODUCER PROGRAM LOTTERY PROCESS**

The following submissions were received by the BC Farm Industry Review Board (BCFIRB) and the BC Egg Marketing Board (BCEMB) during the submission period from June 25 to July 12, 2010. Each submission will be reviewed and considered by BCFIRB and BCEMB as part of the boards' joint review of the BCEMB's New Producer Program Lottery Process. Please note that some contact information has been removed for the protection of privacy; otherwise, the texts of the submissions have been preserved in their original form as received by BCFIRB.

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1	June 27, 2010	Susan Davidson, Glorious Organics	The Certified Organic Associations of BC	<p>To endorse lottery systems as proposed and already used by the BC Egg Marketing Board this spring seems to contradict government policy. You have not caused the BC Egg Marketing board to allocate production rights to farmers with a need for more than 99 hens and less than 3000 to serve their established markets. You have not addressed the actual market needs within classes and geographical regions. And you have not addressed your own recommendations made in 2005.</p> <p>If this lottery system really is the best strategy you can come up with, then at least use separate "hats" for each specialty egg; certified organic, free range, omega 3 enhanced, etc and replicate it for each region of the province. You would need about 28 hats (7 classes x 4 regions) to adequately serve all interests.</p> <p>In the interests of fairness and diversity,</p>	Y
2	July 1, 2010	Nancy Leathley		I am a member of the public interested in healthy food. I think a lottery is not a satisfactory way to deal with any food issue or to make any decision(s) concerning food of any kind.	

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3	July 8, 2010	Meeru Dhalwala Vikram Vij, Vij's and Rangoli Restaurants		<p>As owners of Vij's and Rangoli Restaurants here in Vancouver, we are writing to stress to you the importance of sourcing a local supply of cage-free, organic eggs. More and more of our customers are requesting them. As well, our own family, and most of our neighbours and friends, are demanding such eggs for home consumption.</p> <p>Having to buy cage-free specialty/organic eggs from outside BC is just silly at best and highly unfair, inefficient and perhaps even bullying at worst. We aren't sure why there is a lottery process for smaller scale specialty egg producers in BC, especially when there is a strong consumer demand. And there are plenty of qualified egg producers who meet all BC health and safety standards.</p> <p>Seriously, it is in your hands to make a change for the better for the British Columbian people and local economy. It isn't that difficult, unless you are beholden to the larger, non-specialty egg producers.</p> <p>Eggs from cramped, tortured hens that are fed antibiotics and unhealthy, cheap feeds are just plain gross. If you must keep the lottery, please make sure that it is a fair one and that it represents the needs and wants of British Columbians. We aren't asking for a disbanding of the existing larger egg producers, we're asking you to make room for more smaller-scale, local speciality egg producers.</p> <p>Thanks for your attention to this important matter.</p>	Y
4	July 10, 2010	Steve Easterbrook, Rabbit River Farms (1)		<p>I have reviewed the report on the Lottery Process prepared by Mr. Gillanders. The report's recommendation relating to improving the qualification of applicants by requiring that a business plan and personal net worth statement makes sense.</p> <p>The report however fails to disclose the following information which is important to provide transparency and a clear picture on time lines:</p> <p>1) What type of specialty egg each new entrant will be producing</p>	

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				<p>2) What grader will the eggs be shipped to 3) Will the hens be fed a special diet (ie high lutein, vegetarian or Omega 3) 4) What brand will the eggs be packed under 5) What is the date each producer plans to come into production</p> <p>All of these points will have been decided by now as part of the qualification process. They are extremely important points and must be made public to ensure transparency. When can we expect this information to be provided?</p>	
5	July 10, 2010	Steve Easterbrook, Rabbit River Farms (2)		<p>In reference to FIRB's review of the "New Entrant (Specialty Egg) Producer lottery, I am providing the below feed back and recommendations. The primary problems with the existing New Entrant Lottery program are: 1) it is not market driven (response to consumer and grader demand) and 2) it is not effective at getting the right production to market at the right time.</p> <p>There were 123 New Entrants applicants that managed to get into the first lottery, only approximately 30 were qualified in terms of land, financing, experience, commitment and time line priority.</p> <p>To implement a more more functional selection process I recommend the following:</p> <p>1) The selection process (lottery) needs to be market driven. The "candidate selection process" should start with a GRADER or PROCESSOR making a request that specifies the Selection Criteria:</p> <ul style="list-style-type: none"> a) Type of production required (Organic, Free Range, Free Run) b) Certification requirements (Organic FVOPA, Pro Cert; SPCA, BC Gov't Free Run or Free Range Certified) b) Any special diet considerations that may affect the grower's costs, management practices or expected payment premium. d) Region of the province that the grader is willing to pick up the eggs from the farm gate. e) Desired time line of the grader in terms of when they want production to begin (4 months, 6 months, 8 months ... 1 year) 	

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				<p>(Note the grader / processors are the parties that have a finger on the pulse of customer demand):</p> <p>2) The above criteria is used by the selection committee to qualify lottery applicants as well as evaluate their business plan.</p> <p>3) The Lottery and Selection Criteria (1a to e above) are announced to the public with a due date for application submissions not to exceed 2 weeks.</p> <p>4) Applicants must prepare a simple written business plan that addresses their approach and commitment to meeting each of the 5 Selection Criteria. The business plan would also specify access to financing, land, buildings and experience /guidance. A Personal Net Worth Statement would also be required.</p> <p>NOTE: Any applicant that is serious about becoming a new entrant will be able to assemble a business plan easily within two weeks. The business plan will also indentify the "time line fit" to fill the market need.</p> <p>5) Selection Committee * reviews applications on the submission date and separates into 3 piles:</p> <ul style="list-style-type: none"> a) Incomplete application b) Applicant does not meet all the selection criteria c) Applicants that meet all the selection criteria <p>NOTE: This process will result in qualifying "Barn Ready" (analogy used "shovel ready" projects) serious applicants that are willing to produce the type of egg that is required by the market. This creates the most efficient way of quickly meeting the market driven demand.</p> <p>* Selection Committee should be comprised of some "Neutral" parties from outside the agriculture industry and outside the traditional "club" of accounting firms, service providers, related parties and or providers that may have a conflict of interest (financing, service provider, organization embership). The</p>	

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				<p>selection process should also be open to observation by neutral parties and industry stakeholders to ensure transparency.</p> <p>6) Qualified applicants only (category 5c above) go into the lottery and the lottery draw is conducted in the same manner as described in Mike Gillander's June 22, 2010 letter - ie each applicant name is read out, listed and assigned a number. The number is placed in a box before witnesses. The only difference from what you described is that this process must be open to the public with all interested parties free to attend and observe. The "behind closed doors" culture that went along with the first lottery process was well intended but resulted in total lack of trust on the part of most stakeholders (and is probably in violation of some transparency rule).</p> <p>7) A first runner up and second runner up are drawn for each Market Driven Grader Request. Names are published and winners are notified and given one week to appear before the selection committee.</p> <p>8) Both first runner up and second runner up will present their business plan (separately before the Selection Committee) and show "reasonable" evidence of qualifying for and/or meeting each point of the Selection Criteria. Selection Committee interviews and asks questions of the applicant to verify / cross examine the content of the business plan.</p> <p>9) Selection Committee evaluates both proposals and selects the "runner up" with the business plan and "answers" that most closely matches the Selection Criteria and Production Time Line requirement of the Grader/Processor. Selection Committee documents the reasons for their findings.</p> <p>10) Lottery winner is then given 2 Milestones to be completed within a reasonable time line that relates to the overall Time Line Requirement. Example: Criteria = Free Range, SPCA Certified Production on Vancouver Island, no special diet, to start in 6 months. Milestones: 2 weeks - supply copy of completed SPCA Certification. 4 Weeks supply barn plan that meets SPCA specs. 6 weeks, confirm financing plan. 7 weeks - provide Chick Placement</p>	

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				<p>Permit Application. 8 weeks - supply poultry equipment quote from equipment supplier. (These are all Milestone examples that will serve to keep the progress on track. If Milestones are not met then the Second Runner Up is called forward and First Runner up forfeits their New Entrant status)</p> <p>The above selection / lottery process will:</p> <ol style="list-style-type: none"> 1) Facilitate a market driven response 2) Pre-qualify applicants 3) Stream line timing 4) Improve openness and enlist trust of stakeholders. <p>As previously noted I had submitted this information to FIRB/BCEP in a similar (but less detailed form) on two separate occasions. The recommendations were ignored in the interest of having a lottery process that was totally unspecific on requirements. The result has been that we have 4 lottery winners that are no where near able to gear up to meet market requirement timelines. The applicants are unqualified and there has been no feed back or disclosure to stakeholders as to the business plan progress, specialty production type, grader information, brand the eggs will be packed under or timeline of the applicants. As a Grader that has been requesting supply for years (and is now importing specialty eggs from Saskatchewan and other provinces as well as the U.S. from time to time) I have not heard from any of the lottery winners and have not heard from BCEP Admin staff as to the progress, timeliness or any developments whatsoever. Although we have had a lottery and named 4 new entrants there is no information defining the specialty egg type coming to the market and 5 months have now passed.</p> <p>By separate email submission (today's date) I am advocating and justifying why the pending 2010 New Entrant Lottery Pool should be increased from 12,000 birds to 31,250 birds to meet immediate Specialty Egg market demand. Given that 19,250 of the total 31,250 hens required are of the organic production type and are required within the next year, I am recommending the Lottery process be further narrowed to applicants that can not only be barn</p>	

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				ready but also organic certified immediately or within 6 months. 19250 / 31250 = 62% of the immediate market supply shortfall of Specialty Eggs is for Organic product. The organic certification requirement must be recognized and factored in as a major selection criteria for any new entrant applicant.	
6	July 10, 2010	Steve Easterbrook, Rabbit River Farms (3)		<p>In our past correspondence you have always indicated the importance of back up information to substantiate facts. With reference to the decision on how the New BC Quota will be allocated AND in reference to the need for a more effective Specialty Egg New Entrant Lottery I am submitting the below report of Rabbit River Farm's fill rate performance over the past 6 months to one of our bigger customers. Our major customers are asking how we are going to address the supply shortfall. They are asking what is going on with B CEP and FIRB in that they are not addressing the local supply need of Organic, SPCA Certified and other cage free egg types. they want to know what the plan is to get local supply of specialty eggs balanced to the demand.</p> <p>I have included the comments of one of my larger customers below for your reference. Their complaint echo's the complaints we continuously receive from most of the provinces major chain supermarkets. A table of our fill rate for the first 6 months of 2010 follows. Note the fill rate is after imports from other provinces averaging 8,000 birds of production per week:</p> <p><i>Hello Steve</i> <i>One of the areas we take great pride in is our fill rate to our customers and this is one of our continuous improvement programs. We have just completed six month review of our vendor fill rates. Our target fill rate to our customers is 95% and unfortunately your brand has fallen far under target.</i></p> <p><i>As a result of the terrible fill rate we are put in a position where we must ration the eggs we receive, continually disappointing our accounts . Going forward we expect the demand for Organic and Free Range eggs to increase by minimum 30% annually. However given the current embarrassing undersupply we now are not able to meet the basic needs of new customers and existing customers.</i></p>	Y

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				<p><i>We would like a detailed explanation explaining the reason for your 58% fill rate (see chart below) on Rabbit River Eggs and an action plan for the next three months to meet our 95% target goal. You keep blaming this on the BC Egg Board - who can we contact there that can make some changes!</i></p> <p><i>If we can be of any assistance please do not hesitate to contact myself.</i></p> <p><i>Thank you for your attention:</i></p> <p>Joel Stier Brand Manager, Chill and Frozen</p> <p>Rabbit River Shorts Document</p>	
7	July 10, 2010	Leanne McConnachie M.Sc. - Animal Science Director, Farm Animal Programs Vancouver Humane Society		<p>1. Introduction</p> <p>The Vancouver Humane Society (VHS) strongly opposes the use of battery cages to house egg-laying hens. The hens' welfare is severely compromised, as they can barely move, let alone express natural behaviours such as nesting, dust-bathing, scratching, foraging and wing-flapping – all fundamentally important behaviours for hens. In April of this year, the Manitoba Egg Board stated in a press release that battery cages fail when it comes to meeting the behavioural needs of hens. Leading poultry and animal behaviour scientists from around the world concur that hens suffer in cages. A summary of the scientific literature can be provided upon request.</p> <p>In the interest of animal welfare, and in the interests of our donors and supporters, over the past year the VHS has submitted feedback, comments and recommendations concerning caged layer housing practices to the BC Ministry of Agriculture (BCMAL), the BC Egg Marketing Board (BCEMB) and the BC Farm Industry Review Board (BCFIRB). We have sought a gradual transition away from battery cages to well-managed¹ and certified cage-free (free-run, free-range and organic) practices in an effort to reduce animal</p>	Y

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				<p>suffering and improve animal welfare. Meetings with all three parties have allowed for expanded discussion on the various issues. For further details, we refer you to the binder that was left with Minister Thomson and his assistant RJ Senko at our March 8, 2010 meeting.</p> <p>Although animal suffering should be enough of a reason to quickly transition away from battery cage production, we understand that the BCEMB is looking for economic reasons to justify a change in practices. We are therefore re-submitting some of the information from previous correspondence and meetings about demand, along with additional content, as per the instructions of BCFIRB, as our input to the “official” review of the BCEMB New Producer Program Lottery and specialty quota allocation.</p> <p>On the surface, how an egg marketing board conducts its allocation of quota, and who it chooses to produce that quota, is of no relevance to a humane society so long as those producers practice high standards of animal welfare and cage-free husbandry. However, it becomes relevant to us when those selected are not “barn-ready”, and thus transitioning from battery to specialty cage-free production is delayed. In other words, no immediate gains are made for animal welfare. This is certainly an outcome of the new entrant specialty quota lottery draw held in March 2010.</p> <p>Note 1 - By well-managed, the VHS means barns that offer sufficient space per bird and secluded nest boxes, perches, scratching and dust-bathing areas similar to the standards with BCSPCA Certified and COABC Certified Organic programs. We do not mean open crowded barns with slatted floors and no enrichment or nesting areas.</p> <p>2. Lottery Process The 2009 lottery to allocate 12,000 units of specialty cage-free production was in the planning stages for over two years and was finally held in March 2010.</p>	

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				<p>The process received considerable criticism about its inefficiency, lack of transparency and disregard for appropriately pre-qualifying lottery applicants. The results drew even more scepticism given the relationships of winners to current and former BCEMB directors, the location of their residency and their inability to meet production demands in the short term (none were “barn-ready”). For further details, we refer you to the April 10th and April 14th stories reported in the Vancouver Sun and on CTV (the stories can be viewed on our website at http://www.chickenout.ca/news.html). There is no point repeating those criticisms now, as the lottery is over, and we can only go forward from here.</p> <p>The report released on June 22nd by the BCEMB in review of the lottery process addressed how many of these concerns can be resolved in the future. Equally, an email submitted on June 2nd by Steve Easterbrook of Rabbit River Farms provides many excellent ideas on how to improve upon the upcoming 2010 lottery draw for the subsequent allotment of 12,000 units of new entrant specialty quota. Furthermore, comments submitted by other producers to the BCFIRB on October 12th and 13th of 2009 for consideration <i>prior to the March 2010 lottery being conducted</i> also provided valuable direction on how the lottery should proceed, although it appears much of this advice was disregarded.</p> <p>In summary, recommendations include pre-qualification measures before names are entered into the draw to ensure lottery applicants:</p> <ul style="list-style-type: none"> • are able to begin production in accordance with the timing needed by the marketplace; • can produce in the region of the province where the demand and shortage exists; • are qualified (e.g. have training/certification/funding in place for the type of specialty eggs needed). <p>However, we question the use of a lottery to assign quota in the first place. Although a random lottery might work for long-term planning (e.g. getting a few</p>	

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				<p>next-generation farmers into the production pool to be called upon when future market needs arise), it does not seem to be the most efficient way to address market insufficiencies in the immediate and short-term.</p> <p>It is our understanding that assigning new-entrant specialty quota is already behind by at least 5 years and by 8 permits of 3000 hens each, and that the gap in BC's specialty market could instantly be addressed with the addition of at least 30,000 hens. A second lottery would only present further delays and bureaucracies that would postpone specialty production unnecessarily. In addition, the expense and time involved with a lottery seems excessive considering the small amount of BC's total production the new entrant specialty quota program represents.</p> <p>Importing is NOT an option. Although in previous meetings with the BCMAL we suggested that BC could consider importing eggs until local production was in place, it appears that cage-free eggs are not readily available for import from other provinces or the US, particularly certified organic eggs. Hence, local production must be activated now and suggest that the BCEMB immediately award the outstanding quota to existing, certified, barn-ready producers (unregistered, small-lot and registered). Referring back to producers who were already on the waiting list for quota prior to the implementation of the lottery would also expedite matters.</p> <p>3. Growth in Demand - Global Policies and Trends</p> <p>Global, national and local trends demonstrate a growing demand from consumers, farmers and politicians to end the use of battery cages and a preference for cage-free eggs. Since the BCEMB (and the BCFIRB) require evidence of demand in order to justify quota increases/transitions from caged to cage-free production, for future demand, we turn to global trends and initiatives as indicators of where the market is heading in Canada and BC. For current, short-term market trends, we look to national and provincial indicators of demand and supply inequities. Much of this information has been submitted in the past, but we will reiterate the data for the purpose of this review. We</p>	

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				<p>hope this information will be considered when making decisions concerning allocation of the existing backlog of quota as well as in any upcoming decisions for further quota increases. For the sake of clarity and brevity, the data has been provided in bullet point form.</p> <p>a) European Union</p> <ul style="list-style-type: none"> • Initiatives to ban battery cages in Europe began as far back as 1988. Germany, Sweden, the Netherlands and Switzerland have already banned the use of barren battery cages, and the entire European Union will follow suit in 2012. • European Commission trade agreements will require its trading partners to meet their high levels of farm animal welfare standards for livestock rearing, transport and slaughter methods on animal-derived food products entering the EU. • A European Commission report into animal welfare proposes the creation of a European centre for animal welfare and animal health by the year 2012. This would be responsible for the monitoring and enforcement of existing animal welfare legislation, acting as a co-ordinating body to improve standards of welfare across the EU. Key areas of compliance would be a move away from battery cage systems in egg production, along with other live animal transport and livestock rearing systems that interfere with natural behaviours. A Swedish MEP is promoting a resolution for Rural Development funds to be used to finance an increase in animal welfare work. • Large multinational companies have already adopted cage-free egg purchasing policies for their European operations, including McDonalds-EU (2010), Hellmann's-UK (2008), and Subway (2007). • Major grocers and food retailers have been recognized with "Good Egg Awards" for their elimination and reduction of eggs from caged hens. Notable names include Ikea, Starbucks, Sodexo, McDonalds, and Cadbury. 	

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				<p>b) U.S.A.</p> <ul style="list-style-type: none"> • The State of California will end the use of battery cages by 2015, thanks to overwhelming public support (63.5%) for the ballot measure on November 8, 2008 - Proposition 2 - the Prevention of Farm Animal Cruelty Act. Prop 2 got more votes than any other citizen initiative in California history. The bill was signed into law by Governor Schwarzenegger on July 7, 2010 and will eventually end the suffering endured by egg-laying hens in battery cages, sows in gestation crates and calves in veal crates. The State of Michigan passed a similar law in 2009, giving egg producers 10 years to phase out battery cages. • In July 2010, the Humane Society of the United States, Ohio agriculture leaders and Ohio Gov. Ted Strickland agreed to a deal that will avoid going to the polls with a similar ballot measure as Prop 2, but will lead to major animal welfare improvements in Ohio, including a moratorium on permits for new battery cage confinement facilities for laying hens. • A 2010 study by Jason Lusk from Oklahoma State University (Title: The Effect of Proposition 2 on the Demand for Eggs in California) demonstrates that since the passing of the Proposition 2, the demand for cage-free eggs in California increased by 180% and the demand for organic eggs increased by 20%. This indicates that as soon as consumers become aware of how most eggs are actually produced they are willing to switch to eggs produced in a more humane manner, even if they are more expensive. • In the food retail sector, Whole Foods Market has removed eggs from caged hens from their shelves. Safeway has instituted a policy that will double its purchase of cage-free eggs by 2014 and all of Walmart's private label eggs now come from cage-free hens. In 2007 fast-food giant Burger King began using cage-free eggs in its North American restaurants, followed similarly by Wendy's, Subway, Red Robin, Quiznos, Denny's, Hardee's, and Carl's Jr. who use cage-free eggs in their U.S. operations. • Unilever, makers of Hellmann's brand mayonnaise, announced in February 2010 that its Light Mayonnaise recipe in North America will 	

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				<p>feature 100% certified cage-free eggs. In the United States, this equates to approximately 3.5 million pounds of eggs, or 350 million eggs.</p> <ul style="list-style-type: none"> • Compass Group PLC, a major international foodservice company and distributor, instituted a company-wide policy in the US to source only cage-free shell eggs for their customers. This decision affects 48 million eggs annually in the US. • More than 350 universities and colleges in North America have created policies reducing or eliminating the use of eggs from caged hens. <p>c) Canada</p> <ul style="list-style-type: none"> • A 2009 Harris/Decima poll commissioned by VHS indicates that 69% of British Columbians would support a legislative ban on the use of battery cages for egg-laying hens in the province. A similar poll from 2007 shows 58% in support of banning cages, indicating an 11% growth in support for a ban since 2007. <i>Note: On February 5, 2010, BCEMB sent correspondence to its members trying to discredit the VHS poll. The BCEMB told members the data collection methods and study were distorted, inaccurate and sub-optimal. Harris/Decima is a well-respected research firm and questions submitted by their clients are vetted so they do not compromise their high standards of data collection and methodology. They are professional pollsters and the BCEMB is not qualified to criticize their methods. Furthermore, as the BCEMB is responsible for providing its members with accurate market data to ensure an efficient supply management system, their actions were of great disservice to their members.</i> • A 2009 study conducted by a UBC Animal Science graduate on egg preferences indicates that the purchase of cage-free eggs has experienced significant growth in Canada, doubling from 10.3% of total egg retail sales in 2002 to 20.7% in 2006 (The Nielsen Company, 2007). The data also showed that the total specialty eggs market 	

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				<p>share in BC was higher than elsewhere in Canada (22.9% vs. 16.8%) and possibly even higher than this since the Nielsen data did not account for sales at specialty and health food stores (where the majority of cage-free eggs are sold). One-third of British Columbians indicated they used free-range eggs at home. It also stated the market growth of specialty eggs is faster than for white regular eggs, and is the main reason for the market growth rate of total table eggs. As well, participants stated that bird welfare, environmental concerns and having access to healthy food were the main factors in the selection of cage-free eggs.</p> <ul style="list-style-type: none"> • In April 2010, Unilever's Canadian operations announced it was moving to 100% cage-free eggs, keeping with the brand's commitment to 'Real Food'. Hellmann's® 1/2 the Fat mayonnaise is the first consumer product of its stature and volume in the packaged foods industry to use 100 per cent free-run eggs. This decision equates to approximately 841,000 pounds (382,000 kilograms) of eggs in Canada, thus sparing 21,950 hens from life in a cage. Over time, Hellmann's® intends to change all its mayonnaise products to free run eggs once consistent supply becomes available in Canada. • 15 Canadian universities serve only cage-free eggs on campus, including 6 BC institutions - BCIT, UBC, SFU, UNBC, UVic and Langara College. Others are currently considering similar initiatives, however lack of supply is preventing them from moving forward. • Chartwells, the education division of Compass Group Canada, would like to institute a similar policy for cage-free shell eggs as they have in the US. In a letter to BCMAL's Deputy Minister on April 29, 2009, Compass Group Canada wrote that they would expand their commitment to cage-free shell eggs if consistent supply was available, and pricing was more in line with current caged-shell egg pricing. In fiscal 2007, Chartwells purchased 3.3million shell eggs. • 15 BC municipalities have stated their opposition to battery cage production, and many have adopted cage-free egg purchasing policies for city-run food facilities. Cities include Vancouver, Richmond, Burnaby, Pitt Meadows, Whistler and Victoria, plus the Metro 	

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				<p>Vancouver Regional District.</p> <ul style="list-style-type: none"> The Manitoba Egg Board announced in April 2010 that battery cage barns are on their way out in their province, requiring all new and retrofitted barns as of 2018 to use either enriched caging or other cage-free production methods that support “the five freedoms”. The Globe and Mail ran a story on February 23, 2010 titled “<i>The ‘egg police’ crack down on local grey market eggs</i>”. The story stated that a black market is growing in Ontario for free-range eggs as small-scale producers sell their ungraded eggs beyond the farm gate to health food stores and others in search of free-range eggs. Organic and free-range producers try to keep their profile low and operate under the radar as they fear fines and raids from the Ontario Egg Farmers marketing board. In PEI, cage-free farmers are reporting similar pressure from their egg board, stating the PEI Egg Marketing Board wants to lower the amount of hens small-lot unregistered producers can keep, from 300 to only 50 hens. Small-lot producers would then have to pay the Board levies, and feel this is the Board’s way to put them out of business. The Board argues they simply want the eggs to be graded for health purposes. <p>At VHS, our chickenout.ca website regularly receives requests from consumers asking where they can buy cage-free eggs in their area. Requests come from urban and rural centers, and from across the country. Clearly, demand is growing quickly.</p> <p>4. Evidence of Canadian and Provincial Supply Inadequacies</p> <p>Despite the obvious growth trends for cage-free eggs, and government policies to develop the specialty egg sector, implementation has been slow. In BC, no new entrant permits have been granted since 2004, and based on comments by farmers, consumers, grocers, restaurants and retailers provincially and nationally, supply is insufficient. Many farmers have told us that they continually sell out of their cage-free eggs and have to turn customers away. Grocery stores often have empty shelves where cartons of certified organic</p>	

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				<p>eggs should be, and several restaurants and universities have told us that their food distributor is unable to supply them with cage-free eggs. Those distributors that have cage-free eggs often import them from out-of-province or the US. See Appendix A for a collection of comments from various individuals and organizations giving examples of production and supply frustrations and inadequacies.</p> <p>5. Recommended Cage-Free Growth Transition Plan</p> <p>Although many countries and governments have chosen to implement an eventual ban on battery cage production, the VHS has chosen to encourage industry to gradually transition away from battery cage production towards cage-free housing. By simultaneously encouraging consumers and businesses to buy cage-free eggs, the market will be there to satisfy the economic needs of producers who convert their practices. We are seeking a transition of at least 50% of BC's current egg production to cage-free production by 2015. We feel this is a moderate and achievable goal given BC is already 12% cage-free, the EU will be 100% cage-free by 2012, and the State of California will be 100% cage-free by 2015.</p> <p>The VHS would also like to see improved labelling of eggs in grocery stores (as per Strategy 17 from BCMAL's Agriculture Plan). Terms like "farm fresh" and "natural" mislead customers into thinking these eggs come from pastured free-range hens. A simple "cage-free hens" symbol for cage-free operations, and "eggs from caged hens" on conventional eggs (which is consistent with EU legislation and in parts of the US) would clarify the situation. In our Harris/Decima poll, 78% of British Columbians stated they would support a requirement to label cartons containing eggs from hens raised in battery cages as "eggs from caged hens".</p> <p>The BCMAL has initiated many creative funding programs to develop BC's agricultural sector, and these programs would be an obvious first choice for new entrants to turn to for financial aid to build their specialty production and marketing plans. However, the BCEMB itself could also contribute to and</p>	

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				<p>invest in its future through <i>the levies it already collects</i> from all registered producers. Our understanding is that right now, a good portion of these levies go towards writing off the surplus on conventional white table eggs - throwing good money after a declining market while limiting development of a growing market. As well, revisions to breakage fees for specialty eggs should be made to level the playing field and encourage graders to take on more contracts with cage-free producers, and to develop the market of cage-free eggs for the industrial processed pool.</p> <p>6. Consequences of Inaction</p> <p>BC and Canada are currently at the bottom of the list of western nations in terms of our farm animal welfare standards and regulations. Although BC boasts the largest percentage of its total egg production as cage-free (12% vs. 3% in other provinces), only the province of Manitoba has stated a policy to transition away from battery cages. Refusing to plan and facilitate transition to cage-free eggs fuels negative public perception and accelerates displacement of BC production by US and other provincial imports.</p> <p>By gradually implementing a transition plan that acts on government stated policies now, not only will the balance of supply and demand be restored, but the growth in the specialty sector will provide an added boost for the province as a whole through job creation, succession planning for small-scale farms, tax revenues and development of a sustainable and local food system.</p> <p>7. Summary</p> <p>From the Government's perspective, ensuring specialty supply is in line with demand complements many of the goals and strategies in the BCMAL Agriculture Plan, and is in compliance with the BCFIRB's policies and directives to the BCEMB. Unlike other government policies that often require some "public pain" to achieve a level of public good, fortunately the opposite is true in the case of specialty eggs.</p>	

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				<p>The BCEMB, BCFIRB and BCMAL have the opportunity to embrace or resist change. Given the public sentiment is highly supportive of growth in the specialty and organic sectors, we are optimistic that you will choose to put your policies and words into action. We look forward to your proactive leadership and enforcement of BCFIRB's directives to issue the outstanding specialty egg quota as soon as possible.</p> <p>Appendix A: Comments and Examples of Inadequate Supply</p> <p><u>Universities and Municipalities</u></p> <p>Metro Vancouver Regional District: Email Feb 9/09 from MVRD Policy Analyst "According to our food service supplier it will cost the consumer 15 cents per egg to change to free range. Our food service supplier Eurest buys from Neptune, who unfortunately does not supply organic eggs. So our senior managers decided to make the change just to free range eggs."</p> <p>University of Victoria: Email Feb 25/09 from Manager, Food Services "Through our Purchasing department, I now have pricing on "free-run brown medium" eggs which are the ones we are liable to use, initially at least. The only bulk liquid product Golden Valley carries is "free-run liquid egg white" in 12/500ml cartons, so we'll need to investigate that further as we require 44lb pails of whole liquid egg as well as 10kg pails of cooked and peeled eggs."</p> <p>University of BC: email from Food Services Director, Mar 30/09 "We decided to convert to cage free whole eggs only because the price premium for cage free liquid eggs and other value added egg products was too great for our selling price / margin requirements. We continue with only this product as cage free. Total volume of cage free whole eggs last year was 7950 doz."</p>	

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				<p>BCIT: phone call with Director of BCIT Food Services/Chartwells, Apr 1/09 “We would love to be 100% cage-free, but the supply of cage-free boiled/peeled and liquid eggs is so inconsistent. We need certainty and confidence on its availability, because if we say we’re 100% cage-free, and supply doesn’t arrive, either we wind up lying to our customers, or we have to change the prices every time it happens. If you can guarantee me the supply, we’ll happily go 100% cage-free by September 2009.</p> <p>Queen’s University: Nov 7/08 excerpt from article from Queen’s Journal Queen’s uses factory-farmed eggs, Joli Manson, food services resident district manager, told the Journal... Manson said the vast majority of large institutional users are forced into factory farming because there are not enough cage-free supply chains to manage high consumer demand. “Eggs are subject to supply management. That means that [supply chains] need to buy quota to produce the quantity of eggs that would be required for an account as large as [Queen’s]. I don’t even think Burnbrae could supply free run; they do them for Loblaws, but it’s for a much smaller business. There just is not the supply chain at this point in time.” Manson said...the lack of cage-free farms results in insufficient goods to provide for large institutions.</p> <p><u>Producers/Farmers</u></p> <p>Organic Egg Farmer, Saanich – email from owners/operators Mar 25 and 31,/09 “Local eggs are a very BIG thing here lately. We cannot keep up with the demand and are having to turn people away.” “The number of dozen of eggs sold over the same period last year and the year before has increased dramatically. From January 1st to March 31st: 2007 - 228 dozen sold 2008 - 237 dozen sold 2009 - 401 dozen sold In the past month (March) demand has gone from our capacity of 33 dozen/week to 108 dozen/week. We cannot meet this demand. Further we are aware of other potential markets that we could explore or will be requesting our eggs later this year. We would like to increase our flock size from 95 hens to 300 hens. “</p>	

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				<p>Battery Egg Producer, northern BC – phone and email with owner, January 27, 2009 We have fought for years to maintain production in outlying areas... We are never allowed to grow with our markets... Quota is for sale, but it's offered first to the Fraser Valley...It's so screwed up... The Board does nothing to match egg supply to demand... They need people with a business perspective...No one from government is looking after the interests of the consumer."</p> <p>Organic Egg Producer, Fraser Valley – phone call March 20, 2009 "I don't even know if I'll have a flock next year. I'm so tired of banging my head against a wall just trying to get my permit".</p> <p>Retailers and Grocers (phone discussions)</p> <p>Mayonnaise manufacturer/retailer Senior brand manager said that although there are real problems getting the supply of free-range eggs, <i>the company is committed</i> to moving to free-range or barn in the US and Canada. Canada: Egg volume 6 million lbs (=59.9 million eggs = 220,000 hens): can go cage-free in 6 months once decision made. She said that because Canadian consumers are buying into messages around local food, there is competition for supply and so they would have to import some of their cage-free egg supply.</p> <p>Safeway Langley (20871 Fraser Highway): - there's a narrow supply of free range and organic eggs, especially with organic, since they're from local farms and there are only so many of them</p> <p>Safeway (Kitsilano - West 4th Ave in Vancouver, and Richmond -Blundell Road): - Managers indicated vendor not supplying enough (popular item). Sometimes cases don't even show up.</p>	

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				<p>Capers / Whole Foods (Kitsilano and Robson Street): - demand has remained pretty much the same, maybe increasing slightly - customers go to them for free range and organic eggs, so they sell quite a few - sometimes can't get enough eggs from distributors (this happens around 3x a year, when the farms "switch over" or when the hens may be too young and they can't supply medium or large eggs). 9 10 - demand is high, but free range and organic eggs are all they sell. There are supply problems once in a while</p> <p>Overwaitea (Salmon Arm store) -Manager indicated lack of organic egg supply on store shelves 50-50 due to not ordering enough or vendors not supplying enough</p> <p>Coopers Stores – Kamloops 4 locations – managers indicated if cage-free eggs are not on the shelves then they are sold out/out of stock.</p>	
8	July 11, 2010	Evelyn Pereira, Terra Nossa Enterprises Ltd		<p>Thank you for the opportunity to submit to this review process.</p> <p>As a current holder of a small lot permit (allowing me to have up to 399 layers), I would like to see this number given some consideration and increased.</p> <p>We are a certified organic farm (in our last year of transition IOPA #1904). Our layers will be certified this fall. We offer to our customers (certified) organic pastured eggs. We have a huge waiting list for more of our eggs.</p> <p>The eggs are a viable, valuable net revenue generating part of our diverse farm operation.</p> <p>We have no desire to apply to the lottery process as we do not want to have that large of a layer operation, but we would very much like to increase our numbers up to 500 layers. This would be beneficial to our farm, to our customers and to help the local island community become more sustainable in their food security efforts.</p>	

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9	July 12, 2010	Craig Daniell, Chief Executive Officer, BC SPCA	Steve Thompson, Minister of Agriculture and lands, Richard bullock, Chair, BCFIRB, Al Sakalauskas, General Manager, BCEMB, Rabbit River Farm	<p>The British Columbia Society for the Prevention of Cruelty to Animals (BC SPCA) would like to take this opportunity to comment on the BCEMB New Producer Program Lottery report, and the distribution of quota for the specialty egg market in general.</p> <p>As an animal <i>welfare</i> organization, the BC SPCA is a supporter of animal agriculture and believes that the future success of the egg sector relies, in great part, on fluid reaction to consumer demand and market growth of specialty eggs. As is acknowledged by both the egg industry and market research, consumer demand for specialty eggs continues to increase. We are concerned that the long-term viability and elasticity of the specialty egg sector will not meet current future consumer demands should the quote allocation and new entrant program continue as developed.</p> <p>The BC SPCA receives inquiries from our supporters and the general public for animal welfare friendly products. Consumers have good knowledge about cage free eggs, and feel this is a tangible, positive way to support local farms and alternative animal care practices. What stifles their purchase of specialty eggs, in particular cage-free eggs, is the lack of consistent supply.</p> <p>In the BCFIRB's Sep. 22, 2009 letter and to the BCEMB, it was stated:</p> <p><i>"As the BCEMB has recognized in its proposal, the Ministry of Agriculture and Lands' 2004 Regulated Marketing Economic Policy expects that regulated marketing boards ensure that their allocation decisions provide sufficient allocation for the development of specialty markets, and that they serve the demand for organic food and other products differentiated at the farm level"</i></p> <p>The BC SPCA believes that the current quota over-allocation, whereby quota (minus the new producer program allocation) is distributed amongst all registered quota holders on a pro-rata basis, will not address the real need for an increased allocation of quota to specialty egg producers. An allocation system that does not address graders' importation of cage-free eggs from other provinces to the detriment of local specialty egg producers with whom</p>	Y

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				<p>graders can establish a relationship causes us grave concern. We strongly believe the BCEMB should develop a system which allows for processors and graders to quickly meet this market demand, both with new producers and established producers who would like to increase their specialty egg production allocation (i.e. expand their flock size to address the growing consumer demand for their product).</p> <p>We look forward to your reply and further information on the public hearing to be held in late July. Should you wish to discuss this matter, please do not hesitate to contact our SPCA Certified Program Supervisor, Alyssa Bell Stoneman directly by telephone or email.</p>	
10	July 12, 2010	Ian Christison, Daybreak Farms Ltd		<p>These are my comments and suggestions for changes to the New Producer Lottery Program of the B.C. Egg Marketing Board.</p> <ol style="list-style-type: none"> 1. License should be given out as a "permit" not quota 2. It should be issued to "Areas of Need" not province wide. 3. Open to all classes of eggs. 4. Requirement to own property be removed. 5. Both Producer and Grader be accountable for all eggs produced (no eggs to be covered by the I.P system) <p>I would suggest you read our original submissions on this matter.</p>	Y
11	July 12, 2010	Karl Hann, Biota Farm	Steve Easterbrook, Jon Woodward, CTV, Randy Shore, Vancouver Sun, Consumer Association	<p>First a comment on something that is deemed to be in the public interest. The public knows very little about this subject. Aside from two emails(April 24 and May 20) there is no indication that the FIRB attempted to inform the public at large and request input. From those 2 email it is not evident how many people or groups were reached. Not even the agricultural papers of BC had anything showing that the FIRB requested input into this matter. This whole process seems to take place behind closed doors. For that reason I will try to get this into the public to the best of my ability. I would like to see from the FIRB a media release and inform the public not only the insiders of the PUBLIC HEARING to be held by the end of July.</p>	Y

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			of Canada, The Certified Organic Associations of BC, RJ Senko, AL, Steve Thomson, MLA, Lana Popham, MLA, Katharine McBride and Vancouver Humane Society	<p>If market needs are supposed to be addressed by a Marketing Board and supervised by the Farm Industry Review Board a lottery system is a poor approach.</p> <p>A lottery may work if a standardized commodity is supposed to be produced and all participants face the same challenges. A lottery has the only benefit that no facts have to be considered in a decision making process by respective boards. Appeals no longer have to be handled by FIRB since Fortuna was in charge.</p> <p>In our case we have a market that is very diverse (over half a dozen types of eggs) and it gets even more complicated because it involves different regions with different needs throughout the province. The concentration of farms in the Central Fraser Valley, especially in Abbotsford, has proven costly to the public during the Avian Influenza. For this reason new production was desired in other regions, as part of government policy, regions which are currently importing from other provinces.</p> <p>Improvements to the lottery system are a waste of time. Look at the outcome of the lottery from March 10, 2010.</p> <p>The facts are that 3 people from Abbotsford won the lottery and none of them have a farm to place the birds. In 2009 no production was allocated and with the constraints faced by the "new entrants" supply of the market is still far away in 2010.</p> <p>Another questionable part is the allocation of 2 blocks of 3000 layers per year. What is the rationale?</p> <p>What if a region requires more than one type of egg? If 3000 is more than needed for one but not enough for the other type of egg, how is the Marketing Board dealing with the situation? And what draw will decide which of the 2 winners gets to produce the omega and who the alpha egg that the market needs? And what if the winner does not want to do organic, but it is the only</p>	

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				<p>market short at present?</p> <p>If the BCEMB was confused before about allocation according to market needs this approach is surely not a solution.</p> <p>I wish the government would become the regulator over egg production if the consuming public so desires. If not it should be a free and open market as is the case with most of the Canadian Industry. There is too much conflict of interest at the BCEMB on this issue.</p> <p>This is now made worse, considering the recent appointments to the FIRB, where a regulated producer is on the supervisory board. Which makes me question this whole set-up. Are we really advanced enough to write our own parking and speeding tickets in the future?</p> <p>I look forward to see a date and a place for the public hearing in this matter.</p> <p>This issue should also be of great interest to the Consumer Association of Canada, especially the BC chapter. In February of 2010 the price for a dozen of eggs went up by 9 cents to the consumer. This happened two months after the FIRB received public input regarding breaker eggs. I am not sure how many people know about the reason for this. It is just another clear indication that the people in Victoria should look a little bit deeper into what they are endorsing and what privileges and discretionary powers they allocate to a self-serving interest group.</p> <p>The lottery is a poor approach to satisfy changing markets in our society. It was Wheelan in 1972-74 who wanted to help with regulation, because the Egg Marketing Board established in 1969 failed to do the job. It is time for somebody else to come and straighten this 26 billion Dollar mess out. Because</p> <p>the real problem is not about allocating production according to market needs and common sense. The problem is that in BC the Marketing Board is</p>	

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				ignoring the MARKET!	
12	July 12, 2010	Christopher Bodnar, Glen Valley Organic Farm		<p>Regarding the call for comments on the new producer lottery, I would like to submit the following points:</p> <p>1) A lottery system does nothing to address market needs based on specialty eggs or geographic location. The result of the recent lottery illustrates this point perfectly: production is allocated to farms in Abbotsford, which is already concentrated to a point where disease outbreaks are endemic and water supplies polluted with excessive nitrate levels. The geographic location of the farms is also problematic when the Egg Marketing Board notes that the majority of the applications were from outside the Lower Mainland. Such a lottery system is not in line with existing government policy, nor does it serve the interests of consumers unable to source specialty eggs (such as small-scale, organic eggs) or the needs of farmers in other parts of the province.</p> <p>2) The BC Egg Marketing Board refuses to acknowledge that small-scale producers (less than 3000 hens, yet more than 99) serve a growing market of food-savvy consumers dissatisfied with the quality and sustainability of eggs in the conventional marketing board system. The fact that eggs sell out within an hour of the opening of farmers markets across the province serves as evidence of this fact. This lottery does not take any of this into consideration.</p> <p>3) Recommendations made in 2005 regarding the supply-management system sit unaddressed. Given the time, energy and expense put into those recommendations, they seems like an important (and logical) point to begin examining the supply-management system. These points are too important to leave to chance (i.e. a lottery).</p> <p>A growing body of small-scale farmers is serving a market for sustainably- and humanely-raised eggs, although they are doing so without a policy framework to support their activities and no protection from the existing marketing board. Research has demonstrated the higher nutritional value of eggs from hens provided green pasture space and organic feed in</p>	Y

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				<p>low-stocking rate situations. Consumers who interact with us at farmers markets are aware of this difference and are tired of marketing board interference in their purchasing decisions.</p> <p>Likewise, as a farmer and resident of Abbotsford, where hen stocking rates are obscenely high, my own livelihood and health are routinely impacted by high nitrate levels from the local aquifer -- the direct result of supply-managed poultry farms (as is indicated in government documents). Egg production must be more equally distributed across the province to serve the various regions, to protect the health of local residents and to ensure a more equitable agricultural system amongst farmers across the province.</p> <p>A lottery is the least creative way of addressing these issues and, in fact, does nothing to actually address market trends.</p> <p>Finally, I would like to point out that once again, comments are being solicited at the height of the farming season. It would seem that this is being done (repeatedly) in order to limit the responses to such calls for comment.</p> <p>Thank you for considering my comments.</p>	
13	July 12, 2010	John and Willy Driesen, Rehoboth Farm,		<p>Thank you for the opportunity to comment on the New Producer Program Lottery. We like to present the following facts and recommendations: Fact:</p> <ol style="list-style-type: none"> 1. Specialty Eggs are undersupplied in B.C. 2. It takes a minimum of 3 years to achieve Organic Certification 3. It takes a serious financial commitment as well as experience and knowledge of poultry farming to become a successful egg producer. 4. "Small Lot Authorization producers are eligible for the Specialty New Entrant Program if they wish to grow beyond the 399 layer level, provided they meet 	Y

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				<p>the New Entrant requirements". (bcegg.com/files)</p> <p>5. "The intent of the New Producer Program Lottery is to introduce new producers into the production of eggs." (BCEMB letter to FIRB, June 22, 2010)</p> <p>6. The New Entrant lottery that took place on March 1, 2010 "<i>behind closed doors</i>" (as per Laurie Larson) was not part of a clear and transparent process. And we find it suspicious that the 4 names drawn have connections to past and current Egg Board members.</p> <p>7. One of the names drawn is currently operating his own chicken farm (according to the farm name on the property) even though the farm is technically owned by the farmer's parents. This family is experienced and able to start production with his new quota right away through the help of the parents that are poultry farmers, quota holders as well as a previous Board member of the BCEMB.</p> <p>8. Three of the names drawn are unable to start production promptly because they do not own the facilities required to operate an Egg Production Unit (EPU) and are not third party BC Specialty Egg Certified. Which means BC will continue to be undersupplied, and the import of Specialty eggs from out of province and/or country continues.</p> <p>Recommendations:</p> <p>1. To be eligible to apply for the New Entrant Lottery, a Small Lot Authorization (SLA) permit is required. This will ensure:</p> <ul style="list-style-type: none"> • The applicant has shown a serious commitment to farming before entering their name in the lottery. • The applicant has a business plan/system in place, and has some experience/knowledge of poultry farming with a desire to expand. 	

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				<ul style="list-style-type: none"> • The applicant is aware of and able to meet the financial commitment required to operate a successful EPU. • The applicant is already in operation, and will be able to meet production demand much sooner than unauthorized applicants. • The original intent of the SLA was that once Authorization was received, priority would be given to at least 2 SLA Specialty permit holders to start annually under the New Entrants Program beginning in 2006, as per The Standing Order at that time. <p>2. In order for the Lottery to be a fair and transparent draw, it should be open to, and observed by the general public, and administered by a large reputable third party firm that has no preexisting ties to the BC Marketing Boards.</p> <p>3. Recommend changing the New Entrant Lottery Application criteria to match the Small Lot Application criteria, and add the following definition to family members: “the applicant’s parent(s), and/or spouse, s parent(s)”, for the following reasons:</p> <ul style="list-style-type: none"> • The intent of the New Producer Program is to give an incentive as well as an equal and fair opportunity to start poultry farming for people that do not have the benefit of an inheritance of an existing operation, as is usually the case in a parent child relationship. • Same application criteria should apply for Small Lot and New Producer programs. • We feel this definition was changed by the board members to benefit their own families. <p>4. Recommend BCEMB and the BCFIRB implement BCEMB Standing Order 7 (t) (i) “The Board may use the Market Responsive Allocation Pool (MRAP) of quota that is set aside to allow, subject to FIRB approval, existing TRLQ & Special Permit holders to increase to 5,000 layer if they so wish” . The market demand of Specialty cage free eggs continues to outweigh the supply. It is very unfortunate that BC has to import these eggs from out of province and country while the BCEMB and FIRB have the authority to increase local</p>	

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				<p>production.</p> <p>There appears to be a bias at the BCFIRB and BCEMB level to keep full control over the egg choices available to BC consumers. The past record of new quota distribution and the lack of support and encouragement of new and innovative farming for the “new little guy” continue to be bullied over in favor of the “existing big guys”</p> <p>The objective of our recommendations is to support an open and transparent process which will allow a fair, effective and speedy implementation of the New Producer Program to meet the needs of consumers of Specialty cage free eggs in B.C.</p>	