



May 11, 2016

**VIA EMAIL**

Mr. Jim Collins, Executive Director  
British Columbia Farm Industry Review Board  
PO Box 9129 Stn Prov Govt  
Victoria BC V8W 9B5

Dear Mr. Collins

**Re: Supervisory Review of Chicken Operating Agreement Amendments**

In accordance with the April 29, 2016 directions by the British Columbia Farm Industry Review Board (FIRB), please find enclosed the written submissions of the Chicken Farmers of Canada (CFC). CFC's submission relies on the evidence and submissions already filed.

CFC also acknowledges FIRB's letter of May 6, 2016, enclosing information from the April 14, 2016 minutes of the BC Chicken Marketing Board (BCCMB).

CFC does not regard this information as affecting the issues in this supervisory review and has concerns about the introduction of this information in the review process at this time. In addition, CFC wishes to underscore that CFC's Specialty Production Policy states as follows in the definition of "specialty chicken":

For greater certainty, a processing or production method does not qualify as specialty chicken under this Policy.

CFC also notes that the *Canadian Chicken Licensing Regulations* list the classes of specialty chicken and this list does not include classes defined by a processing or production method such as, for example, kosher chicken.

Thus, to pursue the issues identified in the FIRB's May 6, 2016 letter would require substantial changes to the proposed Operating Agreement, to CFC's Specialty Production Policy and to the *Licensing Regulations*. This is far from simply being a bilateral matter, as between B.C. and Ontario.

Please find enclosed a copy of the policy and the regulations.

Should you have any questions, do not hesitate to contact us or our legal counsel.

Yours sincerely,



Mike Dugate  
Executive Director

- c. Dave Janzen, CFC Chair
- Robin Smith, BC Board Chair
- John Hunter, Q.C., BC Board Counsel
- Wendy Baker, Q.C., PPPABC Counsel
- David Wilson / Ben Grant, CFC Counsel