



BC Farm Industry Review Board

March 22, 2021

File: 44200-60\VEG

DELIVERED BY EMAIL

André Solymosi
General Manager
BC Vegetable Marketing Commission

Dear Mr. Solymosi,

INPUT ON BC VEGETABLE MARKETING COMMISSION CONFLICT OF INTEREST RULES, DECLARATION FORM AND CODES OF CONDUCT

Thank you again for providing the above listed documents in fulfillment of the BC Farm Industry Review Board (BCFIRB) December 22, 2021 supervisory directions. As forecast in my February 16, 2021 letter acknowledging receipt, BCFIRB is providing input for the BC Vegetable Marketing Commission (Commission) on these documents.

Overall, the Commission has done a good job in updating these critical governance documents. While I understand the Commission has finalized these documents, BCFIRB expects the Commission to make amendments based on the following input.

Effectiveness and Transparency

For the purposes of effectiveness and transparency, the Conflict of Interest Rules, Conflict of Interest Annual Disclosure Statement and Code of Conduct need to clearly and consistently cross reference each other. This includes using document titles consistent with the titles on the documents themselves in the cross-references.

For the same purposes, any key terms established and defined in the Conflict of Interest Rules should be consistently used throughout the Annual Disclosure Statement and Code of Conduct.

BCFIRB would like the Commission to consider assembling the documents into one package, with a comprehensive introductory section that contains a description of purpose, use and that sets out all the key terms and definitions that apply to all the documents in one place. The three documents could then be appended to this comprehensive introductory section for much greater clarity and organization.

Web:

Email: firb@gov.bc.ca

Website: www.gov.bc.ca/BCFarmIndustryReviewBoard

Phone:

Info: 250 356-8945

Fax: 250 356-5131

Mail:

PO Box 9129 Stn Prov Govt
Victoria BC V8W 9B5

Office:

2975 Jutland Rd
Victoria, BC V8T 5J9

Strategic and Accountable

For consistency between paragraph 1 and the second introductory paragraph in the Code of Conduct, BCFIRB asks the Commission to amend paragraph 1 to include recognition of the public interest in its role as a regulator.

Regarding paragraph 9 in the Code of Conduct, BCFIRB recommends the Commission emphasize the importance of pro-active conflict of interest disclosure by adding “preemptively” before “...disclose potential conflicts of interest”. This wording is congruent with the Conflict of Interest Rules.

The Commission is also asked to recognize in the Code of Conduct that member responsibility is that of a regulator, not that of an advocate or lobbyist.

In closing, updating these key governance documents is a first step in managing potential perception of bias and conflict of interest related to decision-making going forward. However, the Code of Conduct, Conflict of Rules and Annual Declaration form are only effective and result in accountable outcomes if they are fully implemented and consistently followed.

Regards,



Kirsten Pedersen
Executive Director

cc: BCFIRB web site