



August 1, 2014

File: 44200-00

DELIVERED BY EMAIL

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Dear Chairs:

REGULATED MARKETING AND ANIMAL WELFARE

Following the recent animal welfare issue in the BC dairy industry, BC Farm Industry Review Board (BCFIRB) members reviewed and discussed their general supervisory position and expectations in relation to the subject. The purpose of this letter is to provide clarity on their position and expectations of the regulated marketing boards and commissions with respect to animal welfare.

BCFIRB Position

Overarching government policy to do with animal welfare is the responsibility of the Ministry of Agriculture. Establishing effective legislation, regulations and standards – and educating stakeholders, monitoring and ensuring compliance – is a broader initiative for government, regulators, industry and other stakeholders. Questions about such policy, regulations or legislation should be directed to the ministry.

BCFIRB does however consider that there is scope within the *Natural Products Marketing (BC) Act (NPMA)* for boards and commissions to address appropriate animal welfare standards, from their

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unique regulatory perspective, as an incident of and as a matter of sound marketing policy. BCFIRB is of the view that the *NPMA* provides boards and commissions the authority necessary to adopt and require producers to adhere to certain production standards related to animal welfare so as to ensure orderly marketing is maintained in their sectors. Key aspects of regulation under the *NPMA* concern “production” and “marketing”, and give boards and commissions authority to make orders considered necessary or advisable to promote the marketing of a regulated product. It is clear that without a consumer market for regulated natural products, which market is inevitably influenced by consumer confidence in the methods and practices used to produce those regulated products, the orderly marketing system contemplated by the *NPMA* falls apart.

Recent events demonstrate that the humane treatment of animals is a public expectation. The issue in BC which disrupted the production and marketing of milk reflected poorly on the industry and undermined confidence in the dairy sector as a whole. Such situations can have significant local, provincial and national implications for producers, processors, marketers and consumers as well as the allied trades that support the regulated sectors and the marketing of their products.

BCFIRB’s supervisory expectations have been reflected and communicated to boards and commissions in several places, including:

- a) National Association of Agri-food Supervisory Agencies ‘Supervisory Principles’ (2009), where it is expected that “governing boards and agencies should consider informed and proactive risk management approaches to emerging societal concerns affecting their sectors, such as...animal welfare and care issues”;
- b) BCFIRB’s Strategic Plan, Service Plan and associated public reporting which recognize animal welfare as having “social considerations”; and,
- c) The [Accountability Framework](#) and SAFETI¹ principles developed in cooperation with regulated boards and commissions which also support proactive approaches to managing animal welfare issues and other risks to the regulated sectors.

Expectations

BCFIRB expects boards and commissions to continue their activities in animal welfare standards and issues. Some recent examples include:

- The BC Egg Marketing Board making the decision to incorporate Egg Farmers of Canada’s animal care standards into its General Orders (June 2014).
- The BC Chicken Marketing Board ceasing to place birds on a particular broiler farm, requiring the chicken grower concerned to dispose of their quota (right to produce chicken) due to animal welfare issues (January 2014).
- The BC Turkey Marketing Board working in cooperation with the BC Society for the Prevention of Cruelty to Animals on a turkey welfare concern (2012).

¹ Strategic – Accountable – Fair – Effective – Transparent – Inclusive

- Boards supporting the regulated sectors in establishing national Codes of Practice and working with the BC Farm Animal Care Council in cooperation with non-regulated livestock sectors.

In other words, boards and commissions already share BCFIRB's views with respect to animal welfare. There is good work going on, including many initiatives not mentioned here, at both the provincial and national levels. BCFIRB encourages the boards and commissions to continue sharing information, best practices and ideas on animal welfare matters on an ongoing basis.

It is also BCFIRB's expectation that BC boards and commissions will demonstrate "informed and proactive risk management approaches" to animal welfare by adopting the enforceable standards they consider necessary and appropriate to fulfill their responsibilities under the *NPMA*. The boards will also put measures in place to enable them to respond quickly, effectively and appropriately to emerging issues.

These measures and your progress in addressing animal welfare issues are to be included in your public reporting using the SAFETI principles.

Conclusion

These expectations are not new – and we again recognize initiatives of the boards already well underway in some cases. However, we wish to ensure that all of you are aware that BCFIRB does consider that the boards and commissions have authority under the *NPMA* to address animal welfare issues and that doing so reflects sound marketing policy.

If your boards have any questions, please feel free to contact BCFIRB.

Yours truly,



Andy Dolberg
Vice Chair

cc: James Mack, Assistant Deputy Minister
Agriculture Science and Policy
Ministry of Agriculture

Jack Brown, Chair
BC Cranberry Marketing Commission

David Taylor, Chair
BC Vegetable Marketing Commission

BCFIRB Website