

IN THE MATTER OF THE
FARM PRACTICES PROTECTION (RIGHT TO FARM) ACT, RSBC 1996, c. 131
AND IN THE MATTER OF A COMPLAINT
ARISING FROM THE OPERATION OF A LAYER FARM
IN ABBOTSFORD, BRITISH COLUMBIA

BETWEEN:

SUSAN HODGES AND OTHERS

COMPLAINANTS

AND:

GRB FARMS INC.
(D.B.A. RITCHIE & SONS POULTRY FARM)

RESPONDENT

DECISION

APPEARANCES:

For the British Columbia Farm Industry Review Board	Christine Elsaesser, Vice Chair (Panel Chair) Richard Bullock, Member Barbara Buchanan, Member
For the Complainants	Susan Hodges
For the Respondent	Gordon Ritchie
Date of Hearing	November 10, 2003
Place of Hearing	Abbotsford, British Columbia

INTRODUCTION

1. Under the *Farm Practices Protection (Right to Farm) Act* (the “Act”), a person who is aggrieved by any odour, noise, dust or other disturbance resulting from a farm operation conducted as part of a farm business, may apply to the Provincial board¹ for a determination as to whether the disturbance results from a normal farm practice. If, after a hearing, the Provincial board is of the opinion that the odour, noise, dust or other disturbance results from a normal farm practice, the complaint is dismissed. If the practice is not a normal farm practice, the Provincial board is empowered to order the farmer to cease or modify the practice.
2. By letter dated November 19, 2001 and received December 19, 2001, 25 residents of the Clayburn Village area of Abbotsford applied to the Provincial board for relief from flies emanating from a layer operation located at 34848 Armstrong Avenue, Abbotsford, BC. In their letter, they state:

Mr. Ritchie has a poultry barn in the village that has been the source of an infestation of flies that have made it impossible to spend any time outdoors and difficult to manage them inside our homes. We all realize we live in a farming area, but the problem with the flies this year is not within the realm of “normal”.
3. At the hearing of this complaint, Susan Hodges acted as spokesperson for the Complainants. However, the Panel heard testimony from several other Complainants.
4. Ritchie & Sons Poultry Farm (the “Respondent”) owns the layer operation. Gordon Ritchie runs the day to day operations and represented the Respondent in these proceedings.
5. This matter proceeded to hearing on November 10, 2003. In the morning, before the commencement of the hearing, the three Panel members (Ms. Elsaesser, Mr. Bullock and Ms. Buchanan) attended the neighbourhood where the layer operation is situated.
6. In order to ensure that all necessary evidence was before the Panel, the Provincial board had the following persons with some prior involvement with the layer operation attend the hearing:
 - a) Stewart Paulson, P. Ag., Food Safety and Quality Specialist – Food Safety and Quality Branch, Ministry of Agriculture, Food and Fisheries (“MAFF”);
 - b) Arthur Guite, B.Sc., MPM, RPHI, P. Ag. of RIDpest Services Ltd., a pest management company; and

¹ Note that, effective November 1, 2003, the membership of the Farm Practices Board (“FPB”) was fully merged with that of the British Columbia Marketing Board (“BCMB”), and both tribunals were renamed the British Columbia Farm Industry Review Board (“FIRB”): see *Miscellaneous Statutes Amendment Act*, SBC 2003 c. 7 and BC Reg. 350/2003.

- c) Jack Vaandrager and Bodo Goetzke, members of the Production Management Committee of the British Columbia Egg Marketing Board (the “Egg Board”).

ISSUE

7. The issue before the Panel is as follows: (a) Is the Respondent’s layer farm following normal farm practices relating to pest management, particularly with respect to fly control? (b) If normal farm practices are not being followed, what remedy should the Panel grant in the present circumstances?

FACTS

8. The Clayburn area of Abbotsford is an historical village; there is a General Store and a number of small heritage houses. Many of the Complainants reside in these houses which back onto the lane immediately adjacent to the northern boundary of the Ritchie’s layer operation. Three other Complainants reside in the three houses situated to the western property line of the farm. There is also a new subdivision being developed on the southwestern boundary of the farm.
9. Mr. Ritchie has lived on the property for approximately 30 years. He has been farming there for about 12 or 13 years. The property is approximately 10 acres in size. The Ritchie home is located in the southeastern corner across a small creek. There are two layer barns oriented north-south separated by an entrance hallway, office and storage building creating a “U” configuration. The barns are set back from the property line in accordance with municipal requirements. The east barn is approximately eight years old; the west barn is nine years old. There are two other barns on the property; one is used for raising pullets and the other is used for storage.
10. According to Mr. Ritchie, up until 2000, there were no fly problems on the farm. However, after being away on a one-week business trip he returned to find a fly infestation. He has continued to have fly problems since that time.

SUBMISSION OF COMPLAINANTS

11. The Complainants, all residents of Clayburn Village, want the Ritchie’s layer operation to be run in a manner that does not produce flies or rodents. They want to be able to enjoy their yards in the summer, yet for the past four years this has not been possible. Ms. Hodges spoke to Mr. Ritchie in 1999 about the flies and was assured that his farm did not have a fly problem. By the spring of 2000, the neighbours were experiencing terrible fly problems. They complained to MAFF and since that time, representatives from MAFF and the Egg Board’s Production Management Committee have been involved.
12. Despite the involvement of MAFF and members of the Production Management Committee, the Complainants felt that the fly problems on the Respondent’s farm persisted. In December 2001, they filed their complaint with the Provincial board. Since that time, the Complainants have attended various meetings with representatives of MAFF, the Production

Management Committee and the Provincial board. However, to date they remain unsatisfied with the number of flies originating from the farm.

13. Ms. Hodges stated that the neighbours do not want the farm to move; they just want the fly and rodent populations to be controlled. A number of neighbours attended at the hearing and testified as to the impact of the pest problems on their lives.
14. Madeline Hardin has lived in the village for four years. Prior to that, she owned a hazelnut farm situated between a dairy farm and a horse-breeding farm. When farming in that community, she did not encounter flies as bad as exist in her Clayburn neighbourhood. In the summer of 2000, she hosted an outdoor party for a visiting delegation from Japan. The mayor of Abbotsford was in attendance along with about 100 guests. She describes the event as “absurdly horrible”; flies were on everybody and everything including the food. Ms. Hardin states that she cannot sit outside and have dinner and she believes neighbours have moved because they could not use their yards in the summer. She also has a separate cottage at the back of her house and has observed a problem there with rats and mice. Despite calling in pest control people for the last two years, rodent problems persist.
15. Brian Bell and his wife have lived in their home, kitty-corner from the northwest corner of the Ritchie’s pasture, since May 2001. In the summer of 2001, they held an outdoor party to celebrate their marriage. It was impossible to stay outside due to the flies and they had to move their 50 guests inside. Before having summer barbecues, they have to be diligent in putting up fly strips, as there can be hundreds of flies in the house at one time. Although they never leave the door open, flies still manage to get inside.
16. Susan Kavelman testified that she and her husband did not know of the fly problem when they purchased their house in November 2000. Her daughter, who lives in the house, is very concerned about the potential health problems posed by the large number of flies in the house. Ms. Kavelman and her husband have built a screened-in porch to try and eliminate the problem.
17. Becky Wyse and her husband are also new to the neighbourhood, having bought their 93-year-old house in January 2003. Her husband renovated the house before she moved in with her new baby in May. Although she loves having a farm with cows and sheep nearby, she states that the flies are a real problem. She says it is horrible to always have to apologise to visitors for the flies and she worries about what the flies are leaving behind on surfaces and on food. She states that the flies prevent them from having a normal life. Ms. Wyse maintains that she could handle a few flies, but the number they experience are beyond what anyone should have to expect. She does concede there are “good fly days” but there are also “really bad fly days”. As an example, she states that in a five-minute fly-killing competition her husband killed 60 flies.
18. Faythe Reinheller also loves her neighbourhood and describes it as a bucolic setting. Her children love the sheep and the cows. She states that she wants to deal with this dispute in a neighbourly manner and that she has nothing against Mr. Ritchie personally. However, the flies and rodents cause her to dread springtime. Although she has remained optimistic, the

fly problems have persisted for four years. She describes witnessing flies so thick on her outside doors that the doors looked black. Flies leave droppings on patio furniture, doors, fans and on any clothes hung on the line. She believes the flies are unhealthy and finds the whole situation extremely frustrating.

19. The Panel asked the Complainants whether the situation with respect to flies has improved with the involvement of MAFF and the Production Management Committee. The Complainants felt that there had been some improvement; they all observed some good fly days. However, flies still continue to be a nuisance, limiting their ability to enjoy their homes both inside and out.

SUBMISSION OF RESPONDENT

20. Mr. Ritchie concedes that flies have been a problem on his farm. Due to personal problems, he was unsure whether he would remain on the farm or move. In addition, for some of the past four years, he has not been directly responsible for the farm management. However, he now knows that he will be staying on the farm and indicates a willingness to do what it takes to be a good farmer and neighbour.
21. Mr. Ritchie acknowledges that he has made many of the improvements suggested by the Production Management Committee. However, he notes that farming can be frustrating. Shortly after installing the recommended new nipples on his watering system and seeing marked improvement in the dryness of the manure, a break in the waterline filled his filters with silt and sand. This resulted in more puddling.
22. Mr. Ritchie is aware that his property has a very high water table. Recent developments including a subdivision and a large nursery operation have resulted in more water run off onto his property. As he is aware that the high water table is one cause of water seepage into his barns, he has been looking for ways to remedy the problem. He has considered installing ditches, blacktop and new down pipes to deal with drainage concerns.
23. Mr. Ritchie, at the suggestion of the Production Management Committee, also installed fans to assist in drying out the manure. If changing the fans' orientation would assist in the drying process, Mr. Ritchie expressed a willingness to implement this recommendation. In the past, Mr. Ritchie has had problems with the electrical service to his barns. He has explored upgrades to the electrical service and anticipates a cost of \$18-20,000. Mr. Ritchie thought that he would also have to upgrade his generators at considerable expense. However, during the hearing Mr. Goetzke suggested that as pit fans do not need to come on during a power outage, they do not require a back up generator. Mr. Ritchie has indicated a willingness to obtain quotes from electricians and suggested that upgrades could occur after he ships his flock. Mr. Ritchie is committed to the upgrades as power failures have resulted in bird losses.

KNOWLEDGEABLE PERSONS

a) **Stewart Paulson, P. Ag., Food Safety and Quality Specialist – Food Safety and Quality Branch, MAFF**

24. Mr. Paulson testified that MAFF became involved with this complaint approximately three or four years ago after receiving a large number of calls from the Clayburn area. A number of people expressed concerns about the high level of flies during Heritage Days. A team of MAFF employees went out and inspected the Respondent's operation. Mr. Paulson recalls that the fly levels were extremely high; there were flies outside on the fences and an extremely large fly population inside the barn. The MAFF entomologist recommended an extensive spray program to knock down the fly population to be followed by applications of parasitic wasps to prey on fly larvae.
25. In August 2003, Mr. Paulson returned with the team to look at the operation. In his observation, there were not many flies visible outside and there was a 90-95% improvement inside the barns from their initial visit. They toured the entire operation and again made recommendations for improvements. There was water in the pits due to leaking misters and a water problem along the east wall of the east barn. The greatest number of flies was observed in this area. "Morts" (dead birds) and garbage were being properly contained and disposed of. Mr. Paulson also observed evidence of rodent activity in the building, noting rodent damage in the insulation. The west barn was in fairly good condition with respect to fly control. The team recommended that more residual sprays could be used to improve the fly situation. Mr. Paulson also contacted the farm's parasitic wasp supplier to confirm the number of wasps being purchased and the timing of their application. The farm was using more wasps than other comparable commercial operations. In addition, Mr. Paulson felt the farm was following an excellent procedure by using two different types of parasites.
26. In October 2003, the team returned to the Respondent's farm. They observed fewer visible flies in the east barn or at least the flies were less active. However, the condition of the manure was very bad and ideal for fly production. There was far too much moisture in the pit. The moisture was attributed to two sources, leaking nipples on waterers and water along the foundation walls due to poor drainage. At that time, the team recommended that the barn area be cleaned and drainage between the barns be improved. Mr. Paulson maintains that the most important factor for control of flies is maintaining manure moisture content at about 25-35%.
27. Mr. Paulson advocates a systematic fly management program where manure moisture is managed through controlling water sources, use of fans, addition of sawdust to absorb excess moisture and liming of wet spots. Pit fans need to be operated to reduce moisture content, as a manure pit is the ideal breeding ground for flies. Unless the water is kept out of the pit, problems will reoccur as temperature rises. In addition, the walls of the barns should have residual spray applied before layers are placed in the barns. Care must be taken in applying pesticides to avoid killing the parasites.

28. Mr. Paulson also observed strong evidence of a heavy rodent population. Although there were bait traps, they were not set up in an effective manner. For effective rodent control, bait boxes need to be placed every 50 feet outside and every 20 feet inside. If mice are a problem, bait boxes may need to be spaced every 10 feet.
 29. In Mr. Paulson's experience, given that most complaints arise where residential areas are built close to production units, municipalities should avoid planning pockets of residences in agricultural areas. In Mr. Ritchie's case, his property sits adjacent to an older residential area and a new subdivision is being developed. In these circumstances, Mr. Ritchie must exercise "very strong due diligence" in order to keep rodents and flies under control. He must have a very clear program where someone checks every aspect of the pest control program on a weekly basis.
 30. However, Mr. Paulson also believes that the neighbourhood has a role to play here. They too must also be diligent in keeping fly and rodent populations on their properties under control. Debris or long grass around buildings, bird feeders, pet food and rotting food materials in compost heaps can all attract rodents and must therefore, be eliminated. Organic debris and compost heaps attract flies. In Mr. Paulson's view, the neighbourhood must work together to eliminate these attractants as part of an effective pest management plan.
- b) **Arthur Guite, B.Sc., MPM, RPHI, P. Ag. of RIDpest Services Ltd.**
31. Mr. Guite and his employee, Bert Engelman, both visited the Ritchie farm. Their initial impression was of a clean-looking farm. However, they were both struck by how close the Ritchie layer barns were to existing private residences and a new subdivision. They observed little noticeable fly population in the west barn, while the east barn, especially at the northeastern end, had an extremely large fly population. A possible cause of the fly infestation was attributed to moisture in the manure; the manure appeared soup-like in places. The source of the water was thought to be leaking nipples on the watering system. Mr. Guite was of the view the barn conditions observed in August 2003 were ideal for the production of flies.
 32. In October 2003, Mr. Guite observed water in the barns resulting from poor drainage. This visit followed a very large storm and water was entering the barn through the foundation walls and ponding in the manure pits. This problem was observed in both barns with the greater amount of ponding observed on the east side of the east barn. Mr. Guite was aware that the farm did use fly control measures such as applications of parasitic wasps into the manure bed and chemical control through insecticides such as Pounce, a widely used spray and Stimukil, a granular insecticide. According to Mr. Guite, the primary problem in the operation of the farm related to the lack of records outlining what control measures had been implemented and assessing their effectiveness.
 33. Mr. Guite identified other potential sources of flies in the neighbourhood but found nothing of the same magnitude as the Ritchie operation. Compost can produce flies; to reduce that potential, he recommends that compost be aerated. While he observed another barn in the

area, the predominant wind direction probably would not result in it being a major source of flies for the neighbourhood. As for rodents, any organic matter, refuse or old wood accumulating on properties could act as an attractant. Mr. Guite suggests that a community-wide program could assist in keeping rodent populations down. In looking at the farm, while there was some effort at rodent control, again there was no formalised program.

34. Mr. Guite did suggest that if clusters of flies plagued the neighbours in the early spring, they may in fact have a cluster fly problem. These flies enter a structure later in the fall as temperatures drop and overwinter only to become active again in the spring. Mr. Guite suspects that one reason why the neighbours have so many flies inside relates to the age of their houses; flies can enter through the eaves and the various cracks and crevices often found in older homes.

c) **Jack Vaandrager and Bodo Goetzke, Egg Board Production Management Committee**

35. Mr. Vaandrager has been the chair of the Production Management Committee since March 2003. He is also a member of the Egg Board. He has worked on production management issues for a number of years and is a poultry farmer. Mr. Goetzke is also a poultry farmer and has been a member of the Committee for two years. The Committee's role is to visit farms and make recommendations to the Egg Board and the farmer as to how to solve production, quality or neighbourhood concerns. The Committee's job is not just to criticise; its role is to encourage people to be good farm citizens and good corporate citizens.
36. Mr. Vaandrager and Mr. Goetzke have visited numerous farms in the Lower Mainland, the Interior, and on Vancouver Island. Based on their observations of the farm over five separate visits since November 14, 2001, they describe the farm as very nice and well looked after. However, the Committee has made a number of recommendations to improve on-farm management to deal primarily with flies, including implementing a manure management program and maintaining proper records to record the effectiveness of various treatments to assist with management decisions. They also recommended the installation of manure drying fans. These were installed but adjustments to promote better drying action have also been recommended. There has been discussion about the need to upgrade the electricity on the farm to enable pit fans to run in both barns at the same time. Mr. Vaandrager and Mr. Goetzke also pointed out that as the Ritchie farm is on low land, groundwater entering the barns must be addressed or there will continue to be water problems.
37. Mr. Vaandrager and Mr. Goetzke both feel that Mr. Ritchie has made considerable improvements to his farm at a large cost. However, more needs to be done. In his final report dated October 29, 2003, Mr. Goetzke concludes:

I have been to this farm on numerous occasions in the past two years. We as the PMC committee have made various recommendations over this period of time. They have generally been followed; and as a result there has been an improvement concerning the fly problem. But the problem has not gone away! Why?

It is my opinion that the past recommendations are not a "one time fix it forever" cure. For example, nipple drinkers were changed in 2002, but many are leaking again and must be maintained. Wet manure

spots must be limed at least bi-weekly or removed. Ground water must be removed out of the barn. Water spills must be dried out, limed or removed.

The issue here is flies. The solution here is a regular maintenance schedule of weekly attention to the manure and all facets concerning it. If this is not followed, the farm will continue to have problems.

Because of the location of the farm in Clayburn village, it behoves (sic) the owners to take special care to maintain and run this farm.

It is a given, this farm has less tolerance for mistakes because of its location; and to maintain peace in the neighbourhood, more attention must be given to some of the mentioned minor problems, which create major annoyances for the farms neighbours.

38. Manure management does not have to be expensive or onerous but it requires diligence and time. Mr. Vaandraager states that he does not have a fly problem on his farm; he regularly uses his outdoor barbecue area without concern. He does not have close neighbours yet he goes down into his manure pit regularly liming the manure where wet and changing nipples. This is all part of routine maintenance.
39. Like the other knowledgeable persons, Mr. Goetzke observed that there were other sources of flies in the neighbourhood which may also need to be dealt with. In his opinion, horses can be a source of flies and there are horses in the neighbourhood.

DECISION

40. Adjudicating a complaint under the *Act* involves a two-step analysis. First, a panel must be satisfied that the complainant is aggrieved by odour, dust, noise or some other disturbance emanating from a farm operation. If the complainant fails to establish that he is aggrieved, the complaint must be dismissed without need to consider whether the alleged source of the grievance results from a normal farm practice. If however, the panel finds that the initial threshold question has been met, it must go on to make a determination as to whether the grievance results from a normal farm practice.
41. Section 1 defines “normal farm practice” as follows:

"normal farm practice" means a practice that is conducted by a farm business in a manner consistent with

 - (a) proper and accepted customs and standards as established and followed by similar farm businesses under similar circumstances, and
 - (b) any standards prescribed by the Lieutenant Governor in Council,

and includes a practice that makes use of innovative technology in a manner consistent with proper advanced farm management practices and with any standards prescribed under paragraph (b).
42. The Provincial board has considered the meaning of “normal farm practice” and “proper and accepted customs and standards as established by similar farm businesses under similar circumstances” on a number of occasions. In determining whether a complained of practice falls within the definition of “normal farm practice”, the panel looks to whether it is consistent with “proper and accepted customs and standards as established and followed by

similar farm businesses under similar circumstances”. This analysis involves a close examination and weighing of industry practices but also includes an evaluation of the context out of which the complaint arises. This evaluation may include many relevant factors including the proximity of neighbours, their use of their lands, geographical or meteorological features, and types of farming in the area, and the size and type of operation that is the subject of the complaint.

43. On the initial threshold question as to whether the Complainants are aggrieved by the Respondent farm’s management practises relating to pest control, particularly with respect to flies and rodents, the Panel is satisfied that they meet this threshold. The Complainants have established through their relative proximity and the ongoing nature of their complaint, sufficient personal interest in the subject matter of the complaint. Having found the threshold question met, the Panel must determine whether the flies and, to some lesser extent, the rodents result from normal farm practice.
44. In this case, the Complainants’ evidence with respect to “normal farm practice” was fairly limited, mostly involving anecdotal evidence of those Complainants with prior experience living in farming areas. However, the Panel had the benefit of evidence from several knowledgeable persons, Mr. Paulson from MAFF, Mr. Vaandrager and Mr. Goetzke from the Production Management Committee and Mr. Guite from RIDpest. These gentlemen provided a wealth of experience in poultry operation management including manure management and pest control. All four gentlemen generally agreed that the farm was not following “proper and accepted customs and standards as established and followed by similar farm businesses under similar circumstances” with respect to on-going farm management and pest control.
45. All four gentlemen pointed to the number and proximity of the Respondent’s neighbours and the existence of the new subdivision and felt that in these circumstances, Mr. Ritchie had to exercise greater diligence with his farm management than someone whose farm was not similarly situated. They also supported timely and accurate record keeping as part of any good on-farm management system. Given that Mr. Ritchie has the added complication of a high water table, which presents difficulties in maintaining optimum moisture levels in manure thereby increasing the breeding potential for flies, he must take steps to remedy drainage issues.
46. Mr. Ritchie does not dispute that there have been problems with his farm management in the past. However, he has demonstrated a willingness to implement recommendations to improve farm management issues and was very candid in these proceedings, acknowledging that more work needed to be done on his farm.
47. Given the foregoing, the Panel does not have any difficulty finding that the Respondent farm’s pest management practises relating to flies do not fall within the definition of “normal farm practice” as defined in s. 1 of the *Act*. Further, based on the evidence of Mr. Paulson, Mr. Guite, Mr. Vaandrager and Mr. Goetzke, given the proximity of his neighbours, the Respondent must exercise more diligence with his on-farm management rather than less. Accordingly, the Panel directs that the Respondent modify its pest control

program dealing with flies to accord with generally accepted practices within the layer industry for an operation of this size and proximity to neighbours.

48. Although the neighbours' primary complaint related to flies, the Panel also heard evidence of rodent problems in the area. Unlike the flies, it is less clear that the Respondent's farm is a source of rodents. The evidence of the knowledgeable persons was that much of the Lower Mainland has a rodent problem. However, based on the evidence of Mr. Paulson, the Panel is satisfied that there is evidence of a significant rodent problem on the farm itself and a failure by the Respondent to implement an adequate pest control program. Accordingly, the Panel directs that the Respondent modify its pest control program with respect to rodents to accord with generally accepted practices within the layer industry.
49. However, the Panel observes that it was not demonstrated in this hearing that the Respondent's farm is the only source of rodents in this neighbourhood. Indeed, this appears to be a community problem. Given that these complaints arise out of the existence of pests which may originate from a number of sources and which may travel considerable distances, the solution here does not rest with the Respondent alone. The entire neighbourhood must be vigilant in implementing a pest management strategy. To this end, Mr. Guite offered his services to the community. Although this Panel does not have jurisdiction to order the neighbourhood to take any particular action, it is clear that the solution to pest control lies not just with the Respondent. Potentially, the farm could implement the directions above and this neighbourhood may still have a problem with rats and flies. The whole neighbourhood must do its part in eliminating attractants which encourage pests. If flies are overwintering in homes, steps need to be taken to eliminate these populations and prevent future entry into homes. The neighbours are encouraged to make use of professional pest management expertise to work towards a neighbourhood solution.

ORDER

50. Given that we have found a breach of the *Act* insofar as the farm management practices complained of result in excessive fly and rodent populations, s. 6(1)(b) of the *Act* confers upon the Panel the jurisdiction to order the farm to modify the practice in the manner set out in the order, to be consistent with normal farm practice. Normal farm practice with respect to the pest control requires the implementation of reasonable measures to attempt to mitigate those pests.
51. Accordingly, and pursuant to s. 6(1)(b) of the *Act*, the Panel orders the Respondent to modify its farm management practices to reduce pests, specifically flies and rodents, as follows:
 1. Implement an ongoing manure management system, designed or endorsed in writing by a qualified technical professional, which includes the following terms of reference:
 - a) To eliminate moisture sources within the barn due to poor drainage and leaking downspouts;

- b) To treat moist areas of manure with lime;
 - c) To maintain misters and nipple waterers;
 - d) To orient pit fans to maximise drying action.
2. Implement additional fly and rodent control systems designed or endorse in writing by a qualified technical professional.
 3. Maintain appropriate records in support of the foregoing management plans.

Dated at Victoria, British Columbia, this 19th day of July 2004.

BRITISH COLUMBIA FARM INDUSTRY REVIEW BOARD

Per

(Original signed by)

Christine Elsaesser, Vice Chair

Richard Bullock, Member

Barbara Buchanan, Member