



December 16, 2014

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DELIVERED BY EMAIL

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Dear Sirs/Mesdames:

EGG FARMERS OF CANADA CHANGE TO BOARD OF DIRECTORS MEETING SCHEDULE

By way of an August 8, 2014 memorandum “Changes to EFC’s Board of Directors meeting schedule”, Egg Farmers of Canada (EFC) advised the BC Farm Industry Review Board (BCFIRB) and other provincial supervisory agencies of its intention to hold its regular September and February meetings “in camera” (directors only), commencing September 2014. It is our understanding that a similar memorandum was provided to Farm Products Council of Canada (FPCC), the federal supervisory agency.

After receipt of this memo, BCFIRB researched this matter and discussed it with a number of stakeholders including the National Association of Agri-food Supervisory Agencies (NAASA). We carefully considered that information in formulating the following response as the supervisory agency for British Columbia.

We note that the issue of to what extent EFC meetings should be “closed” is not new. It dates back to at least 2003 when concerns were raised with EFC (then the Canadian Egg Marketing Agency) regarding “closed” meetings. It arose again in 2006 when BCFIRB and other supervisory agencies expressed concerns about their routine exclusion from the agency’s national meetings. By way of a June 7, 2006 letter, BCFIRB required the BC Egg Marketing Board (BCEMB) to “vigorously pursue changes to (EFC’s) current in camera and communication policies so as to promote a transparent and effective approach to including signatories at meetings.” That remains our instruction to the BCEMB today.

As we stated in 2006, BCFIRB appreciates that there will be some issues more appropriately addressed in a closed forum. However, these should be strictly limited and balanced against the importance for EFC to demonstrate transparency and accountability. Excluding the federal and provincial supervisory agencies from the full September and February meetings going forward does not appear to be a balanced approach that takes transparency and accountability into consideration.

Overall, BCFIRB notes growing public expectations for transparency in organizations established by legislation. From a public perspective, a move to further 'in camera' (directors only) meetings, versus consideration of a balance of open, closed and 'in camera' meetings – depending on the issue – appears as a step away from transparency, and in relation, accountability. BCFIRB is of the view that such perceptions continue to be far more detrimental to the supply managed sectors than any possible benefit gained from further closing down EFC meetings to supervisory oversight.

The general point in our December 12, 2011 letter¹ still stands:

BCFIRB is very aware of the major contribution supply management makes to the national and provincial agri-food sectors. Our board is equally aware of its responsibility to protect the public interest by ensuring the supply managed boards we supervise are conducting themselves strategically, accountably, fairly, effectively transparently and inclusively. Those are principles we have developed in consultation with our boards in BC and which we expect they, as well as we, will follow. BCFIRB would be surprised if FPCC felt much different about supply management and the oversight responsibilities of supervisory agencies.

Supply management is a significant public trust provided to industry. In BCFIRB's view, there is a shared responsibility to ensure that the federal-provincial supply management systems – including for eggs – are held accountable in the exercise of their legislated authority. This includes the federal and provincial supervisory boards, operating and communicating together on behalf of the public, being able to demonstrate there is scrutiny of the supply management system adequate to maintain that important social licence.

Yours truly,

A handwritten signature in black ink, appearing to read 'John Les', written in a cursive style.

John Les
Chair

cc: British Columbia Ministry of Agriculture
British Columbia Egg Marketing Board
National Association of Agri-food Supervisory Agencies
BCFIRB web site

¹ BCFIRB to FPCC, copy EFC re: EFC proposed allocation and levy increase.