

# Primary Poultry Processors Association of British Columbia

c/o 13538 73<sup>rd</sup> Avenue  
Surrey, BC V3W 2R6

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March 26, 2014

BC Farm Industry Review Board

Attn: Jim Collins  
Wanda Gorsuch

Dear Sir or Madam:

Following you will find the perspectives and recommendations of the BC Primary Poultry Processors Association (BC PPPA) with respect to the poultry initiative towards establishing a producer/grower insurance program to compensate producer/growers in the advent of an outbreak of Avian Influenza in BC.

Firstly the BC PPPA would like to commend the committee and industry for the work done to date in developing and bringing forward this program.

The BC PPPA has the following comments and recommendations, upon which support of the BC PPPA for this initiative will be based.

1. In the advent that the BC FIRB determines that the proposed program is consistent with sound marketing principles, the BC PPPA believes the program must be mandatory for all producers who are registered within the system and are considered to be governed by way of regulations related to Supply Management. To have only partial participation by producers would defeat the benefits and the intent of the program.
2. The BC PPPA strongly recommends that the program have the accompanying requirement for annual 3<sup>rd</sup> party administered biosecurity audit, administered to a representative number of producers. All producers should be audited at a frequency which would contribute to adequately safeguarding the industry. These audits should not be announced in advance. Audit failures should have prior set out consequences, relative to the identified level of infraction. This recommendation is made with the ambition to keep the program fresh and viable and to retain the highest possible standard of application and execution.
3. The biosecurity program and the audit program should be reviewed annually by an industry committee, not solely comprised of producers.
4. The costs associated with the program are producer costs. The costs are not to be included in Cost of Production calculations or consequently in the live price of the birds purchased by primary processors.

Sincerely,



Scott Cummings  
President, BC PPPA