



VANCOUVER ISLAND FARM PRODUCTS INC.

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April 30, 2020

VIA EMAIL

BC Farm Industry Review Board
PO Box 9129 Stn Prov Govt
Victoria BC V8W 9B5

Attention: Wanda Gorsuch

Re: 2019-2020 Vegetable Supervisory Review

Below are our answers to your questions set out in your letter of April 3, 2020 regarding the 2019-20 Vegetable Supervisory Review:

1. Commission Structure

Vancouver Island Farm Products (hereinafter referred to as "VIFP") believes that over time the BCVMC structure and governance has been on balance and have acted fairly to the industry stakeholders, however, as market and growth opportunities change VIFP feel that the VMC could use some adjustments; including having an independent member outside of the industry with experience that would be relevant to our structure thus adding a fresh set of eyes to look at the what, why and how we function within the regulated sector.

VIFP represents growers considered small and other producers that are deemed large. We don't believe that because a grower is considered small that they should not be represented fairly or consistently strictly due to their volumes. Collectively throughout the province their numbers are significant and the size of their facilities have no relation to their passion and drive to grow and market food to consumers in their perspective regions.

Post script addition to Part 1

VIFP has a concern that creating a number of sub committees and advisory groups to help the structure of the VMC can and will take on a life of its own and could potentially lead to even more regulations, unnecessary meetings as well as adding multiple layers to an already complicated decision making process for the VMC.

We believe there needs to be more of a narrow focus on results and outcome based regulation verses input focused regulations

2. Designated Agency Accountability

We support the aspect of Agency accountability and believe it is a natural flow of agency operations. We would like to make the point as well that providing food is a very fluid and ever changing dynamic industry and the developing of a framework should not be overly onerous and cumbersome but should enhance the effectiveness of an Agencies operations and its ability to do the utmost they can for the success of producers.

We are of the view that the agency system is working taken as a whole agencies are successful entities in their own right thus leads to the success of the growers.

Post script addition to part 2

VIFP feels it must be stated that a one size fits all model by way of regulation and structure is not the correct course of actions in terms of agency accountability as it related to volume or crop mix but accountability should be based on principles as well as there needs to be equal emphasis on mutual accountability between agencies,producers and the VMC.

We strongly disagree with the notion that public reporting should be a part of the process as even though Agencies are an arm of the VMC they are still very clearly private limited companies protected by the governing rule of law.

Commented [s1]:

3. Storage Crop Delivery Allocation

Storage Crop Delivery Allocations has been an effective tool to enhance orderly marketing to this point but one area in mind that really needs clarity is new entrant policy. There is nothing in the General Orders that states how much delivery allocation a new entrant can or should receive. VIFP believes that there should be an entry level delivery allocation amount granted to new producers which they can build upon. This would streamline the new entrant application as the current model can take months if not years to finalize. We want to encourage and welcome new growers to the industry.

As the paragraph in the Appendix C states “Rights and Obligations granted to business entities by designation can, in the absence of progressive management, restrict access and may serve to limit entrepreneurship and innovation.” VIFP believes that in many ways the retail consolidation is a misnomer as there are many and varied niche retail markets and regions throughout BC including Vancouver Island and the Okanagan. We don't believe in a one size fits all model for agencies as there are many different aspects of marketing to multiple business retail models.

In regards to producer shippers we are very concerned about delivery allocation as by their very nature there appears to be no accountability or transparency as they are single entities and do not work with agencies. Therefore they do not have to adhere protocols of SAFETI and this circumstance can very easily set up a situation where individuals try to manipulate the system for their own personal gain rather than collectively viewing the overall industry needs.



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Thank you for the opportunity to discuss these issues.

Best Regards,

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