

October 27, 2020

File No.: 580206-2

Sent Via E-mailBritish Columbia Farm Industry Review Board
PO Box 9129 Stn Prov Govt
Victoria BC V8W 9B5**Attention: Kirsten Pedersen**

Dear Ms. Pedersen:

Re: Chicken Sector Pricing Review Process - Relevant Pricing Information

We write as counsel for the Primary Poultry Processors Association of British Columbia (the “**PPPABC**”) in relation to the Chicken Sector Pricing Review Process. We write this letter in an attempt to clarify what information will be relevant to the Chicken Sector Review Pricing Review Process.

In the Draft Terms of Reference dated October 6, 2020, the British Columbia Chicken Marketing Board (the “**Chicken Board**”) and the British Columbia Broiler Hatching Egg Commission (the “**Commission**”) identify a number of “risks” to the Chicken Sector Pricing Review. Three of the “risks” relate to stakeholders not providing sufficient data throughout the process.

Since this supervisory review process commenced, the PPPABC has not received any indication from the Chicken Board or the Commission on expectations or what information they need to understand processor competitiveness. If the Chicken Board and the Commission are truly concerned about the risk of not receiving sufficient information, one measure to “mitigate the risks” is for the boards engage in early dialogue with the PPPABC to discuss what information or data is relevant to the Chicken Sector Pricing Review.

Processors are the only stakeholders in this review who compete against one another in the open market, so sharing data and information to measure competitiveness is inherently different and riskier than sharing data to measure producer returns. This makes it even more important for the Boards to have a constructive dialogue with the PPPABC to determine what information and data is relevant, and how to access comparative data from their competitors in Central Canada. Without such data from Central Canadian processors, seeking confidential information from British Columbia processors will be of little value, unduly prejudicial, and exposes BC processors to unnecessary competitive risk.

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The PPPABC wants to work with the Chicken Board, Commission, Ms. Holm, and the supervisory review panel to agree on expectations and ensure that they have relevant data to understand processor competitiveness. The PPPABC has retained an expert to assist with reasonable and appropriate measures for processor competitiveness and will begin that work once there is a better understanding of information expectations.

Given this situation and the timelines, the PPPABC requests to meet with Ms. Holm and the boards to discuss what information is relevant to understanding processor competitiveness. The PPPABC looks forward to scheduling a meeting to discuss this matter as soon as possible.

Yours truly,

Dentons Canada LLP

A handwritten signature in black ink, appearing to be 'MLC', written over a light blue horizontal line.

MLC/

cc. Wendy Holm, BCFIRB Project Liaison