

Aljane Farms.

May 08, 2023

BY EMAIL

(Wanda.Gorsuch@gov.bc.ca)

BC Farm Industry Review Board
PO Box 9129 Stn Prov Govt
Victoria, B.C. V8W 9B5

Attn: Wanda Gorsuch, Manager Issues & Permitting

MPL British Columbia Distributors Inc. (MPL BC) Agency Prior Approval Process – Written Submission

Ms. Gorsuch:

Following our May 1, 2023 letter to the BC Farm Industry Review Board (BCFIRB) expressing our intention to participate in the hearing concerning MPL BC's agency designation application with the BC Vegetable Marketing Commission (the Hearing), we would like to provide further input.

As a licensed producer of BC regulated greenhouse vegetables, Aljane Farms is a family-owned and operated 5-hectare greenhouse established in 1984. Located in Pitt Meadows BC, we employ 20 staff and produce roughly 1.5 million KG of Bell Peppers annually.

I am writing to express my strong opposition to the proposed new sales agency. As someone who has worked in this industry for many years, I believe that this agency would have a detrimental impact on our business.

Given our role as an active producer in this sector, any new designated agency in the industry, including MPL BC, directly impacts Aljane Farms and our interests. We believe that BCFIRB should not approve MPL BC's agency designation application for the following reasons:

1. The current number of designated agencies serving the BC regulated greenhouse vegetable market is adequate, considering the number of producers. Introducing an additional designated agency is unwarranted and may result in higher costs for both producers and consumers.
2. We are content with our existing agency and are not aware of any demand for a new one.

3. As a family-owned enterprise, we cannot afford disruptions to our operations.
4. The introduction of a new designated agency might strain our relationship with our present agent and/or other producers due to increased competition.
5. Our business operations will not benefit from MPL BC's addition, as agency contracts often group our produce with that of other producers, making our profits reliant on the agency's capacity to fulfill diverse orders from multiple producers. Consequently, if a producer were to leave their current agency for MPL BC, our profits could be jeopardized.
6. We are familiar with MPL BC's litigious approach toward both producers and the BC Vegetable Marketing Commission. Consequently, we fear that including MPL BC could expose us to legal risks and damage the existing collaborative relationship among producers, designated agencies, and regulatory authorities in BC.
7. The agency would be a solution in search of a problem, with no evidence that the industry requires additional Agencies.
8. The new sales agency would create unnecessary competition, adding an additional layer of complexity to an already competitive industry.
9. The agency could have the power to set prices and regulate supply, potentially creating unfair competition and stifling innovation in the industry.
10. After assessing the offerings from Sunset, I feel the varieties are not proprietary and would not be advantageous in a market that is already saturated with comparable SKU's. Growing the varieties offered would not give us any benefit or competitive advantage in the marketplace.

In conclusion, we kindly ask that BCFIRB carefully consider these factors in the decision-making process and recommend denying MPL BC's designated agency application at this time. The potential negative impact on the industry far outweighs any perceived benefits. Thank you for your attention to this important matter.

Sincerely,



Wayne Soo

cc. BC Farm Industry Review Board (firb@gov.bc.ca)



May 5, 2023

By Email

Wanda.Gorsuch@gov.bc.ca

BC Farm Industry Review Board

PO Box 9129 Stn Prov Govt

Victoria, BC. V8W 9B5

Attn: Wanda Gorsuch, Manager Issues & Permitting

MPL British Columbia Distributors Inc. (MPL BC) Agency Prior Approval Process Written Submission

Ms. Gorsuch:

We write further to our letter of May 1, 2023 to the BC Farm Industry Review Board (**BCFIRB**) indicating our participation in BCFIRB's hearing related to MPL BC's agency designation application before the BC Vegetable Marketing Commission (the **Hearing**).

CVG Veg Products Ltd. is a producer licensed to produce BC regulated greenhouse vegetables. We are a family owned farm that started growing greenhouse vegetables in 2010 in Maple Ridge BC. We produce 2,000,000 heads of butter lettuce and 750,000kgs of specialty peppers per year while employing over 45 people.

Overall, as an active producer of BC regulated vegetables, CVG Veg Products and its interests are directly affected by the addition of any new designated agencies in this specific industry, including MPL BC.

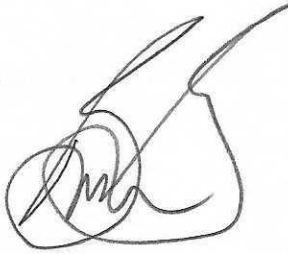
From our perspective as a producer in the BC regulated greenhouse vegetables market, the BCFIRB should not approve MPL BC's agency designation application at this time for the following reasons:

CVG Veg Products Ltd. Box 1330, Aldergrove, B.C. V4W 2V1

- Current designated agencies are sufficient to support current producers. Additional agencies could lead to increase costs to consumers.
- We are happy with our current agency and don't see a need for more agencies.
- Additional agencies would put more price pressure for family farms as the market gets over competitive...which would restrict growth in future production.
- Being a family owned business, we can't afford any disruptions in our operations.
- We don't believe we will benefit from another agency due to the nature of our producer/agency contracts. It is normal for agencies to pool produce and our pricing would be impacted by any fulfilment issues if producers were leave to go to a new agency. This would jeopardize our current profitability.

We hope the BCFIRB takes all these factors into consideration in its decision and encourage the BCFIRB to decline the MPL BC's designated agency application at this time.

Sincerely,

A handwritten signature in black ink, appearing to be 'M. J. Smith' or similar, written in a cursive style.

cc. BC Farm Industry Review Board (firb@gov.bc.ca)

Global Greenhouse Produce Inc.

May 9, 2023

BY EMAIL

(Wanda.Gorsuch@gov.bc.ca)

BC Farm Industry Review Board
PO Box 9129 Stn Prov Govt
Victoria, B.C. V8W 9B5

Attn: Wanda Gorsuch, Manager Issues & Permitting

**MPL British Columbia Distributors Inc. (MPL BC) Agency Prior Approval Process –
Written Submission**

Ms. Gorsuch:

We write further to our letter of May 1, 2023 to the BC Farm Industry Review Board (**BCFIRB**) indicating our participation in BCFIRB's hearing related to MPL BC's agency designation application before the BC Vegetable Marketing Commission (the **Hearing**).

Global Greenhouse Produce Inc. is a producer licensed to produce BC regulated greenhouse vegetables.

Overall, as an active producer of BC regulated vegetables, Global Greenhouse Produce Inc. and its interests are directly affected by the addition of any new designated agencies in this specific industry.

From our perspective as a producer in the BC regulated greenhouse vegetables market, the BCFIRB should not approve new agency designation applications at this time for the following reasons:

- **The existing number of designated agencies servicing the BC regulated greenhouse vegetables market is sufficient in relation to the number of producers. The addition of an additional designated agency is unnecessary and could lead to increased costs for both producers and consumers.**
- **We are satisfied with our current agency and are unaware of any demand for an additional agency.**

- **The addition of a new designated agency may affect our relationship with our current agent and/or other producers as competition grows in this space with added agencies.**
- **The nature of our operations will not benefit from the addition of a new agency due to the nature of producer/agency contracts. Agencies often bundle our produce with that of other producers meaning that our profits are dependant on our agency's ability to fulfill diversified orders from a combination of producers. Therefore, if a producer were to leave its existing agency to work with a new agency, there is a risk to our own profits.**

We hope the BCFIRB takes all these factors into consideration in its decision.

Sincerely,

Ken Sandhu

Global Greenhouse Produce Inc.

cc. BC Farm Industry Review Board (firb@gov.bc.ca)

Humble Farmer Ltd

8837 Prest Road

Chilliwack

May 8, 2023

BY EMAIL

(Wanda.Gorsuch@gov.bc.ca)

BC Farm Industry Review Board
PO Box 9129 Stn Prov Govt
Victoria, B.C. V8W 9B5

Attn: Wanda Gorsuch, Manager Issues & Permitting

**MPL British Columbia Distributors Inc. (MPL BC) Agency Prior Approval Process –
Written Submission**

Ms. Gorsuch:

We write further to our letter of May 1, 2023 to the BC Farm Industry Review Board (**BCFIRB**) indicating our participation in BCFIRB's hearing related to MPL BC's agency designation application before the BC Vegetable Marketing Commission (the **Hearing**).

Humble Farmer Ltd is a producer licensed to produce BC regulated greenhouse vegetables. We are [New producers, an operation size of 19,600 sqm located in chilliwack bc. This winter we will be producing Long english cucumbers. Employing 9-12 people with a annual production projection of +5 million pieces.

Overall, as an active producer of BC regulated vegetables, Humble Farmer Ltd and its interests are directly affected by the addition of any new designated agencies in this specific industry, including MPL BC.

From our perspective as a producer in the BC regulated greenhouse vegetables market, the BCFIRB should not approve MPL BC's agency designation application at this time for three reasons:

-The majority of producer in the BC greenhouse vegetable space are not requesting for another agency.

If Producer are not demanding for additional representation then things need not change.

- **The existing Agencies are developing markets that satisfy bc greenhouse producers needs.**

**-A new agency may cause potential under cutting to gain customers satisfaction.
Which would potentially hurt bc greenhouse producers**

We hope the BCFIRB takes all these factors into consideration in its decision and encourage the BCFIRB to decline the MPL BC's designated agency application at this time.

Sincerely,

Gordi Toor Owner

Humble Farmer Ltd

cc. BC Farm Industry Review Board

Merom Farms Ltd.

May 9, 2023

BY EMAIL

(Wanda.Gorsuch@gov.bc.ca)

BC Farm Industry Review Board
PO Box 9129 Stn Prov Govt
Victoria, B.C. V8W 9B5

Attn: Wanda Gorsuch, Manager Issues & Permitting

**MPL British Columbia Distributors Inc. (MPL BC) Agency Prior Approval Process –
Written Submission**

Ms. Gorsuch:

We write further to our letter of May 1, 2023 to the BC Farm Industry Review Board (**BCFIRB**) indicating our participation in BCFIRB's hearing related to MPL BC's agency designation application before the BC Vegetable Marketing Commission (the **Hearing**).

Merom Farms Ltd. is a producer licensed to produce BC regulated greenhouse vegetables.

Overall, as an active producer of BC regulated vegetables, Merom Farms Ltd. and its interests are directly affected by the addition of any new designated agencies in this specific industry.

From our perspective as a producer in the BC regulated greenhouse vegetables market, the BCFIRB should not approve new agency designation applications at this time for the following reasons:

- **The existing number of designated agencies servicing the BC regulated greenhouse vegetables market is sufficient in relation to the number of producers. The addition of an additional designated agency is unnecessary and could lead to increased costs for both producers and consumers.**
- **We are satisfied with our current agency and are unaware of any demand for an additional agency.**

- **The addition of a new designated agency may affect our relationship with our current agent and/or other producers as competition grows in this space with added agencies.**
- **The nature of our operations will not benefit from the addition of a new agency due to the nature of producer/agency contracts. Agencies often bundle our produce with that of other producers meaning that our profits are dependant on our agency's ability to fulfill diversified orders from a combination of producers. Therefore, if a producer were to leave its existing agency to work with a new agency, there is a risk to our own profits.**

We hope the BCFIRB takes all these factors into consideration in its decision.

Sincerely,

Ken Sandhu

Merom Farms Ltd.

cc. BC Farm Industry Review Board (firb@gov.bc.ca)



May 12, 2023

BY EMAIL

(Wanda.Gorsuch@gov.bc.ca)

BC Farm Industry Review Board
PO Box 9129 Stn Prov Govt
Victoria, B.C. V8W 9B5

Attn: Wanda Gorsuch, Manager Issues & Permitting

**MPL British Columbia Distributors Inc. (MPL BC) Agency Prior Approval Process –
Written Submission**

Ms. Gorsuch:

We write further to our letter of May 1, 2023, to the BC Farm Industry Review Board (BCFIRB) indicating our participation in BCFIRB's hearing related to MPL BC's agency designation application before the BC Vegetable Marketing Commission (the Hearing).

MT LEHMAN GREENHOUSES LTD AND MT LEHMAN VEGETABLE FARMS is a producer licensed to produce BC regulated greenhouse vegetables. We are a family-owned operation and have been in business for more than 12 years. We have a total of 35 acres under glass and we grow Bell peppers and Long English cucumbers. Our annual yield for cucumber is 185 pieces / m² and for bell peppers our annual yield is 31 kg/m². We employ TFW and local workers and have a total of 60 workers.

Overall, as an active producer of BC regulated vegetables, MT LEHMAN GREENHOUSES LTD. AND MT LEMAN VEGETABLE FARMS IN. and its interests are directly affected by the addition of any new designated agencies in this specific industry, including MPL BC.

From our perspective as a producer in the BC regulated greenhouse vegetables market, the BCFIRB should not approve MPL BC's agency designation application at this time for the following reasons:

- **The existing number of designated agencies servicing the BC regulated greenhouse vegetables market is sufficient in relation to the number of producers. The addition of an additional designated agency is unnecessary and could lead to increased costs for both producers and consumers.**
- **We are satisfied with our current agency and are unaware of any demand for an additional agency.**



- **Our company is a family-owned business that cannot afford any disruption to its operations.**
- **The addition of a new designated agency may affect our relationship with our current agent and/or other producers as competition grows in this space with added agencies.**
- **The nature of our operations will not benefit from the addition of MPL BC due to the nature of producer/agency contracts. Agencies often bundle our produce with that of other producers meaning that our profits are dependant on our agency's ability to fulfill diversified orders from a combination of producers. Therefore, if a producer were to leave its existing agency to work MPL BC, there is a risk to our own profits.**
- **We are aware of MPL BC's litigious attitude toward both producers and the BC Vegetable Marketing Commission. As a result, we are concerned the addition of MPL BC puts us at risk to litigation and would sour the existing working relationship between producers, designated agencies, and regulatory authorities in BC.**
- **After considering the product offerings/ varieties/ brands available through MPL, we do not see a benefit in a market that is already saturated with comparable product offerings/ varieties/ brands. It is our opinion, that these product offerings/ varieties/ brands, would not provide us with any additional benefit or competitive advantage in the marketplace.**

We hope the BCFIRB takes all these factors into consideration in its decision and encourage the BCFIRB to decline the MPL BC's designated agency application at this time.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paramjit Badhesa', written over a horizontal line.

PARAMJIT BADHESA

CEO/OWNER

cc. BC Farm Industry Review Board (firb@gov.bc.ca)



Peppertree Farms Ltd.

Greenhouse Vegetable Division

May 5, 2023

BY EMAIL

(Wanda.Gorsuch@gov.bc.ca)

BC Farm Industry Review Board
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Attn: Wanda Gorsuch, Manager Issues & Permitting

MPL British Columbia Distributors Inc. (MPL BC) Agency Prior Approval Process – Written Submission

Ms. Gorsuch:

We write further to our letter of May 1, 2023, to the BC Farm Industry Review Board (BCFIRB) indicating our participation in BCFIRB's hearing related to MPL BC's agency designation application before the BC Vegetable Marketing Commission (the Hearing).

Peppertree Farms Ltd. is a producer licensed to produce BC regulated greenhouse vegetables. We are a family-owned farm harvesting 350 MT of peppers and eggplant in a 1.74 ha greenhouse. Our farms are located in Abbotsford, and we employ 17 workers in the greenhouse.

Overall, as an active producer of BC regulated vegetables, Peppertree Farms Ltd. and its interests are directly affected by the addition of any new designated agencies in this specific industry, including MPL BC.

From our perspective as a producer in the BC regulated greenhouse vegetables market, the BCFIRB should not approve MPL BC's agency designation application at this time for the following reasons:

- The existing number of designated agencies servicing the BC regulated greenhouse vegetables market is sufficient in relation to the number of producers. The addition of an additional designated agency is unnecessary and could lead to increased costs for both producers and consumers.

- We are satisfied with our current agency and are unaware of any demand for an additional agency.
- Our company is a family-owned business that cannot afford any disruption to its operations.
- The addition of a new designated agency may affect our relationship with our current agent and/or other producers as competition grows in this space with added agencies.
- The nature of our operations will not benefit from the addition of MPL BC due to the nature of producer/agency contracts. Agencies often bundle our produce with that of other producers meaning that our profits are dependent on our agency's ability to fulfill diversified orders from a combination of producers. Therefore, if a producer were to leave its existing agency to work MPL BC, there is a risk to our own profits.
- We are aware of MPL BC's litigious attitude toward both producers and the BC Vegetable Marketing Commission. As a result, we are concerned the addition of MPL BC puts us at risk to litigation and would sour the existing working relationship between producers, designated agencies, and regulatory authorities in BC.
- After considering the brands, varieties and or product offerings available through MPL / Sunset, we do not believe there is a benefit in a market that is already saturated with comparable brands, varieties, and product offerings. It is our view, that these brands, varieties, and product offerings would not give us any additional benefit or competitive advantage in the marketplace.

We hope the BCFIRB takes all these factors into consideration in its decision and encourage the BCFIRB to decline the MPL BC's designated agency application currently.

Sincerely,



Loren Taves

cc. BC Farm Industry Review Board (firb@gov.bc.ca)