

October 17, 2023

File No.: 582211-1

**Sent Via Email Justine.Lafontaine@gov.bc.ca**British Columbia Farm Industry Review Board  
PO Box 9129 Stn Prov Govt  
Victoria, BC V8W 9B5**Attention: Justine Lafontaine**

Dear Sirs/Mesdames:

**Re: MPL British Columbia Distributors Inc. ("MPL BC") Agency Prior Approval Process**

We write with respect to BCFIRB's decision, dated October 11, 2023, approving MPL BC's designation as an agency for a probationary period (the "Decision"), to seek confirmation of the effective date and applicable period of MPL BC's agency designation.

**We kindly request that you bring this letter to the attention of the BCFIRB Supervisory Review Panel as soon as possible. Given impending deadlines, we further request that the BCFIRB Supervisory Review Panel confirm, as soon as possible, MPL BC's understanding of the immediate effective date and applicable period of its agency designation.**

MPL BC thanks BCFIRB for the Decision and is looking forward to continuing to work collaboratively with it and the Commission in the coming years.

To that end, and in furtherance of MPL BC's commitment to complying with the Commission's General Orders and all directions from BCFIRB and the Commission, MPL BC refers to paragraph 79 of the Decision, in which BCFIRB advises that it approves the designation of MPL BC as a designated agency for "a probationary period, that being the 2024-2025 growing season".

It is MPL BC's understanding that BCFIRB intended to designate MPL BC as an agency such that it could be in a position to immediately begin to market regulated product in the 2024 Crop Year ('Crop Year' is defined in the Commission's General Orders as being from January 1<sup>st</sup> to December 31<sup>st</sup>); and that MPL BC's agency designation is therefore effective immediately, with the understanding that, in practice, it will not be able to begin marketing regulated product until January 1, 2024. **We kindly request that BCFIRB confirm this understanding.**

For context, growers wishing to market through MPL BC in the 2024 Crop Year must notify their existing agencies and apply to the Commission to do so, both by **October 31, 2023**. As mentioned, per the Commission's General Orders, the Crop Year for greenhouse crops is January 1<sup>st</sup> to December 31<sup>st</sup>. If MPL BC is to market regulated product in the 2024 Crop Year, it and growers must immediately take

steps in this regard (in advance of October 31); proceeding otherwise would delay its effective entry into the market to the 2025 Crop Year, which is contrary to paragraph 79 of the Decision.

We look forward to hearing from BCFIRB regarding the above.

Yours truly,

**Dentons Canada LLP**



Morgan L. Camley  
Partner

cc: Robert Hrabinsky, BC Vegetable Marketing Commission (via email)