

**Scott, Melissa AGRI:EX**

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**From:** Coney, David AGRI:EX  
**Sent:** Thursday, August 21, 2014 8:58 AM  
**To:** Standish, Alana AGRI:EX; Mack, James AGRI:EX; Sturko, Derek AGRI:EX  
**Subject:** FW: Funding Initiative/Poultry Insurance

See note from Jim Collins, below (COMB is Council of Marketing Bds, the umbrella group for the BC SM boards).

We will be meeting with FIRB shortly to discuss next steps on both the self insurance piece and the FIRB levy piece.

s.12,s.13,s.14

Best,  
David.

David Coney  
Policy Manager  
B.C. Ministry of Agriculture  
Tel: 250 387 3232

**From:** Collins, James K AGRI:EX  
**Sent:** Wednesday, August 20, 2014 10:17 AM  
**To:** Anderson, Heather L AGRI:EX; Coney, David AGRI:EX  
**Cc:** Gorsuch, Wanda AGRI:EX  
**Subject:** Funding Initiative/Poultry Insurance

s.13,s.17

s.13

Jim

*Jim Collins*  
*Executive Director*  
*BC Farm Industry Review Board*  
*Tel: 250-387-3915*

*\*\*Please note: This email message, including attachments, is intended for the addressee(s) only and may contain legally privileged information. Any unauthorized use, distribution, disclosure or reproduction is strictly prohibited. If you have received this email in error, please notify sender by return email and delete all copies.\*\**

**Scott, Melissa AGRI:EX**

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**From:** Coney, David AGRI:EX  
**Sent:** Friday, August 15, 2014 7:55 AM  
**To:** Sturko, Derek AGRI:EX  
**Cc:** Mack, James AGRI:EX; Standish, Alana AGRI:EX  
**Subject:** Fwd: BCFIRB Supervisory Decision - Poultry Insurance  
**Attachments:** 14 Aug 14 BCFIRB Supervisory Decision - Poultry Insurance.pdf; ATT00001.htm

I know you were cc'd on this decision from FIRB, but wanted you to know we also have it in policy, and will be discussing next week when i get back to office. s.12,s.13,s.14  
s.12,s.13,s.14

David.

Sent from my iPad

Begin forwarded message:

**From:** "Gorsuch, Wanda AGRI:EX" <[Wanda.Gorsuch@gov.bc.ca](mailto:Wanda.Gorsuch@gov.bc.ca)>  
**Date:** August 14, 2014 at 3:35:50 PM PDT  
**To:** "Coney, David AGRI:EX" <[David.Coney@gov.bc.ca](mailto:David.Coney@gov.bc.ca)>  
**Subject:** FW: BCFIRB Supervisory Decision - Poultry Insurance

David  
BCFIRB poultry Insurance decision - sent today.  
Wanda



August 14, 2014

File: 44200-70 POULTRY INS

**DELIVERED BY E-MAIL**

Cassey Langbroek  
Chair  
BC Broiler Hatching Egg Commission  
180 – 32160 South Fraser Way  
Abbotsford BC V2T 1W5

Robin Smith  
Chair  
BC Chicken Marketing Board  
101 – 32450 Simon Av  
Abbotsford BC V2T 4J2

Richard King  
Chair  
BC Egg Marketing Board  
250 – 32160 South Fraser Way  
Abbotsford BC V2T 1W5

Ralph Payne  
Chair  
BC Turkey Marketing Board  
106 – 19329 Enterprise Way  
Surrey BC V3S 6J8

Dear Chairs:

**SUPERVISORY DECISION – SOUND MARKETING POLICY AND BOARD AUTHORITY –  
MANDATORY POULTRY DISEASE INSURANCE**

Thank you for your June 9, 2014 subsequent Joint Poultry Industry Submission in response to the BC Farm Industry Review Board's (BCFIRB) request for further clarification related to disease insurance for the poultry sectors (May 6, 2014). BCFIRB has carefully reviewed and assessed all the submissions it has received from the boards and stakeholders to date. BCFIRB has also assessed the larger legal and policy questions arising from this matter, and how to most effectively move this issue forward.

The 2004 high pathogenic avian influenza outbreak was devastating to BC's poultry industries and associated value chains. BCFIRB recognizes and commends the extensive work and resources invested to date by all stakeholders to prevent future outbreaks, as well as following up on potential measures (e.g. insurance options) for managing industry recovery should another event occur.

Currently a group of BC poultry producers seeks to establish a captive insurance company (to be owned and operated by the producer associations) which would provide insurance coverage to licensed producers against low and high pathogenic avian influenza outbreaks. The proposal is based on the poultry boards using an assumed authority under the *Natural Products Marketing (BC) Act (NPMA)* to: (a) make avian influenza insurance mandatory for licensed producers; and, (b) collect levies for the purposes of producers' premiums as well as capitalizing and operating the captive insurance company.

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**British Columbia  
Farm Industry Review Board**

**Mailing Address:**  
PO Box 9129 Stn Prov Govt  
Victoria BC V8W 9B5  
Telephone: 250 356-8945  
Facsimile: 250 356-5131

**Location:**  
1st Floor, 780 Blanshard Street  
Victoria BC V8W 2H1  
Email: [firb@gov.bc.ca](mailto:firb@gov.bc.ca)  
Website: [www.firb.gov.bc.ca](http://www.firb.gov.bc.ca)

Neither the poultry boards nor BCFIRB would have regulatory or supervisory responsibilities related to the proposed captive insurance company (or another approach to insurance) if it did not involve the exercise of authority under the *NPMA*.

BCFIRB continues to acknowledge insurance as an important risk management tool for producers and recognizes insurance can be part of sound marketing policy. Poultry sector efforts to address potential gaps in insurance coverage are a good example of proactive stakeholder action for the benefit of BC agriculture.

Given the proposed approach to insurance involves exercise of poultry board authority under the *NPMA*, the questions for BCFIRB to initially determine under s. 9<sup>1</sup> are:

- whether mandatory insurance falls within the poultry boards' legal authority, and;
- whether mandatory insurance accords with sound marketing policy.

In considering these questions, BCFIRB notes that the policy and legal implications<sup>2</sup> of mandatory insurance extend well beyond the immediate purpose of providing one of several means of establishing insurance coverage for avian influenza.

## **BCFIRB Findings**

### **Mandatory insurance and poultry board authority**

BCFIRB has concluded that the high level of legal uncertainty and prospect of challenge is such that proceeding to implement mandatory poultry insurance in the absence of clear legal authority under the *NPMA* is not in the best interest of the BC regulated poultry sector.

### **Mandatory insurance and sound marketing policy**

Based on the arguments to date<sup>3</sup>:

BCFIRB remains unconvinced that mandatory insurance (an extra level of regulation) *for the purposes of establishing and operating a captive insurance company* to provide coverage for avian influenza contributes effectively and strategically to orderly marketing beyond the authorities and tools already in place.

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<sup>1</sup> 9 (1) The Provincial board has exclusive jurisdiction to inquire into, hear and determine all those matters and questions of fact, law and discretion arising or required to be determined by the Provincial board under this Act or a federal Act and to make any order permitted to be made.

(2) Without limiting subsection (1), the Provincial board has exclusive jurisdiction to inquire into, hear and determine whether a decision, order or determination of a marketing board or commission accords with either or both of the following:

(a) sound marketing policy;

(b) a scheme or the orders of the marketing board or commission.

(3) A decision, order or determination of the Provincial board under this Act on a matter in respect of which the Provincial board has exclusive jurisdiction is final and conclusive and is not open to question or review in any court.

<sup>2</sup> Long-established federal-provincial supply management policies and authorities

<sup>3</sup> January 17, 2014 and June 9, 2014 Joint Poultry Submissions and other communications.

BCFIRB is not satisfied that the proposed captive insurance company, which would be established and operated with monies collected using poultry board authority under the *NPMA*, accords with sound marketing policy.

BCFIRB does acknowledge that as a matter of sound marketing policy, there are arguments supporting the boards being provided with limited authority to make poultry insurance mandatory in response to certain circumstances. Further examination could confirm that mandatory insurance of some kind may be necessary to complement regulatory and other measures currently available to address avian influenza prevention and production recovery issues.

## **BCFIRB Order**

For all the reasons outlined in this letter, and in the exercise of BCFIRB's supervisory authority under the *NPMA*, the boards are directed not to exercise their regulatory authority under their schemes at this time for the purpose of supporting the proposed captive insurance company.

Should one or more of the board propose proceeding with a more limited regulatory solution, that solution is to be submitted to BCFIRB, with rationale, for prior supervisory approval.

## **BCFIRB Reasons**

### **Mandatory insurance and poultry board authority**

In its May 6, 2014 letter, BCFIRB stated it would continue to examine the question of sound marketing policy, leaving it to the poultry boards' discretion on whether they wished to provide further legal opinion at the time. The May 6 letter also noted that:

The three legal opinions accompanying the Submission [January 17, 2014] appear to provide differing assessments as to whether the poultry boards can establish a proper link between mandatory insurance and the purpose of orderly marketing. However they do not provide substantive arguments addressing both sides of the legal question.

In the June 9, 2014 subsequent Joint Submission, the poultry boards confirmed their satisfaction with the August 29, 2013 legal opinion from Cavanagh LLP.<sup>4</sup>

Our own analysis still indicates that a significant degree of uncertainty exists as to whether any form of mandatory poultry insurance is currently authorized under the *NPMA*.

This level of uncertainty increases substantially as you move from: (a) boards simply making insurance mandatory; (b) to mandatory insurance intended to compensate for business interruption in addition to the costs directly associated with promptly returning the marketing cycle to full production; (c) to boards establishing, administering and funding insurance directly; to, (d) boards collecting levies for the purposes of producer premiums as well as capitalizing and funding the operation of a captive insurance company formed by the producer associations.

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<sup>4</sup> In summary, the legal opinion put forward that poultry boards have sufficient authority under the *NPMA* to make insurance mandatory and to collect levies for the purposes of the producer associations establishing and operating a captive insurance company (including the collection of levies for producer premiums).

Even if BCFIRB could be confident that mandatory insurance at its most basic level was within the jurisdiction of the poultry boards – and legal opinions differ on that question – the boards using their authority to support formation and operation of a captive insurance company is, in our view, clearly not contemplated by the *NPMA*.

In BCFIRB's view, legal challenge of the poultry boards using their authority under the *NPMA* to support establishment and operation of an association-owned captive insurance company is likely. Such a challenge, which may come from a single commodity producer, regional interest or stakeholder, could potentially impact the entire poultry industry's ability to deliver and administer an effective approach to risk management.

Following the 2004 avian influenza outbreak, BCFIRB was satisfied that there was scope within the *NPMA* for boards and commissions to address appropriate mandatory biosecurity standards as a matter of sound marketing policy. However, BCFIRB also pointed out to government and the boards (June 27, 2006) that as risk management work proceeded further legislative or regulatory support may be required.

Despite the detailed submissions to date from the boards, BCFIRB remains of the view that the high level of legal uncertainty and prospect of challenge is such that proceeding to implement mandatory poultry insurance in the absence of clear legal authority under the *NPMA* is not in the best interest of the BC regulated poultry sector.

#### **Mandatory insurance and sound marketing policy**

As the June 9 Joint Submission of your boards notes, the core question is: *How to effectively and efficiently return the poultry industry to a system of orderly marketing?*

From a regulatory perspective, the next question that must be asked is 'do the tools already exist to support achieving the goal?' BCFIRB observes that any effective, efficient and strategic system is based on a combination of tools and approaches – not regulation alone.

At this stage BCFIRB believes existing tools – board authority over licensing and production including authority to require cleaning and disinfecting – would go a long way to providing a framework for a timely return to orderly marketing in the event of an avian influenza outbreak. BCFIRB agrees with the poultry boards that the Canadian Food Inspection Agency (CFIA) is the final authority in allowing a return to production in this scenario, but it also observes that CFIA would still be the final authority in allowing a return to production even if a producer holds insurance.

As the Submissions point out, requiring cleaning and disinfecting does not address potential financial challenges for producers in a disaster. These would include unexpected cleaning and disinfecting costs along with lost production and replacement costs. These costs in 2004 were managed through a variety of supports from government, processors and the poultry boards. Looking forward, these financial supports may or may not be available to the same degree in the future. Insurance is certainly one means to help cover some of these costs. If at least some of these costs are not covered through some means, there is likely risk that there would be a sufficient numbers of producers delaying return or exiting the industry such that a timely return to orderly marketing would be severely impacted.

From regulatory and supply management policy perspectives there may be a sound marketing policy argument in support of some form of mandatory insurance that would help cover unexpected costs directly influencing a timely return to production (e.g. cleaning and disinfecting costs, chick replacement costs). BCFIRB observes there could likely be some impact on a timely return to orderly marketing if these costs are not covered through some means (including but not limited to insurance).

As noted above, producers would also face temporary income loss and other business losses associated with business interruption. From a sound marketing policy perspective, BCFIRB has difficulty extending a regulatory requirement for mandatory insurance to business interruption losses. BCFIRB observes that while there may be impact on individual businesses depending on their financial situations, mandatory insurance coverage for business losses may not be a key factor in an overall timely return to orderly marketing. It is not clear to BCFIRB that there is a strong argument linking business loss and a timely return to orderly marketing.

Recently, high pathogenic avian influenza insurance became available to broiler and layer producers in Canada. Egg producers have additional coverage under a national Egg Farmers of Canada program (for which levies are being collected). Agri-Recovery (government program) is being used to compensate producers for some low pathogenic outbreaks and other government compensation programs are in place at this time. Although turkey and hatching egg producers are without the additional level of private coverage currently available to broiler and layer producers, it is clear that solutions to insurance gaps are developing.

Given the foregoing, BCFIRB assesses that it is premature to commit to a complex regulatory relationship with significant policy and legal questions between the poultry boards (industry regulators under the *NPMA*) and the poultry associations (non-profit interest groups) in connection with a captive insurance company (business regulated under the *Insurance Act* and the *Financial Institutions Act*).

Subject to the boards clearly establishing where regulatory gaps could be filled by mandatory insurance, BCFIRB does agree in principle that a limited authority to require mandatory insurance (i.e., as a condition of producer license) could accord with sound marketing policy. Such measures could also allow for boards and individual producers to assess and establish insurance requirements based on the needs of their industry, their region and other risk management measures over time. BCFIRB does not agree, in the face of significant outstanding policy and legal questions at many levels, that poultry boards participating in the proposed formation and operation of a captive insurance company accords with sound marketing policy.

### **Concluding comments**

BCFIRB acknowledges that there have been extensive resources invested to date by the proponents of the captive insurance company. However, for the reasons outlined in this letter, even if such a company could be established under the terms of other legislative and policy requirements governing such companies (a point not addressed in the materials), BCFIRB is not satisfied that the proposal satisfies the legal test and the sound marketing policy test of the *NPMA*.

BCFIRB is prepared to work with the poultry boards in discussing with the Ministry of Agriculture whether a near term change to the *NPMA* to allow limited authority to require mandatory insurance is

Casey Langbroek  
Robin Smith  
Richard King  
Ralph Payne  
August 14, 2014  
Page 6

feasible and necessary at this time. We assess, however, that a more substantive legislative change to accommodate any type of relationship between the poultry boards and a private insurance company may be a much larger – and longer term – policy and legislative question for government.

BCFIRB notes it does not have the jurisdiction to address the provincial legislation governing insurance in BC. We expect, however, that any initiative proposing a role for the poultry boards in insurance – directly or indirectly – would require equally careful legal and policy scrutiny from the authorities responsible for administering that legislation. In the end we would expect all relevant authorities would have opportunity for appropriate scrutiny and be jointly informed whether all authorities were satisfied.

### **Order**

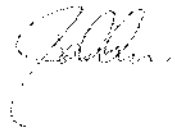
For all the reasons outlined in this letter, and in the exercise of BCFIRB's supervisory authority under the *NPMA*, the boards are directed not to exercise their regulatory authority under their schemes at this time for the purpose of supporting the proposed captive insurance company.

Should one or more of the boards propose proceeding with a more limited regulatory solution, that solution is to be submitted to BCFIRB, with rationale, for prior supervisory approval.

In accordance with s. 57 of the *Administrative Tribunals Act*, "an application for judicial review of a final decision of (BCFIRB) must be commenced within 60 days of the date the decision is issued."

BRITISH COLUMBIA FARM INDUSTRY REVIEW BOARD

Per



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John Les  
Chair

cc: Derek Sturko, Deputy Minister  
Ministry of Agriculture

BCFIRB web site

Harvey Sasaki



## Scott, Melissa AGRI:EX

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**From:** Mack, James AGRI:EX  
**Sent:** Tuesday, October 21, 2014 1:33 PM  
**To:** Steward, Lonny AGRI:EX  
**Subject:** FW: AI insurance

*James Mack  
Assistant Deputy Minister  
Agriculture Science and Policy, Ministry of Agriculture  
Phone: 250-356-1821  
[james.mack@nov.bc.ca](mailto:james.mack@nov.bc.ca)*

**From:** Ray Nicke s.22  
**Sent:** September 13, 2014 1:23 PM  
**To:** Mack, James AGRI:EX  
**Cc:** 'Harvey Sasaki'; 'Allen James'; s.22 'Brian Red'; Bruce Apperloo; 'Dan Kampen'; Derek Janzen;  
s.22 Hester Mulder; 'Jake Esau'; 'Joe Neels'; Kerry Froese; 'Ravi Bathe'; s.22 ; 'vic  
Red'; walter siemens  
**Subject:** AI insurance

Hi James,

We appreciated the opportunity to have a follow-up conference call after our brief visit to Victoria on Aug 28<sup>th</sup>. The BCPA met on Sept the 9<sup>th</sup> and had further discussion around some of the comments and suggestions made at our meeting together and the conference call. The association would like to work with the ministry for purposes of having the mandatory insurance program go ahead, but with the intention of it being able to manage risk around a low path AI diagnosis.

This continues to point towards a captive insurance vehicle especially if it will also allow the industry to save premium costs in the long run.

The following are recommendations coming out of the meeting for your consideration:

s.13,s.17

Look forward to your response

Sincerely

Ray Nickel  
President, British Columbia Poultry Association

## **Scott, Melissa AGRI:EX**

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**From:** Mack, James AGRI:EX  
**Sent:** Friday, October 17, 2014 5:08 PM  
**To:** 'Ray Nickel'  
**Cc:** Etsell Garnet; James Allen; Harvey Sasaki; Manager BC Turkey Benoit Michel; Scott, Melissa AGRI:EX  
**Subject:** RE: AI insurance

Ray,

Apologies for the delay in responding.  
s.13,s.17

James Mack  
Assistant Deputy Minister  
Agriculture Science and Policy, Ministry of Agriculture  
Phone: 250-356-1821  
[james.mack@gov.bc.ca](mailto:james.mack@gov.bc.ca)

-----Original Message-----

**From:** Ray Nickel s.22  
**Sent:** October 17, 2014 8:50 AM  
**To:** Mack, James AGRI:EX  
**Cc:** Etsell Garnet; James Allen; Harvey Sasaki; Manager BC Turkey Benoit Michel  
**Subject:** AI insurance

Hi James,  
s.13,s.17

s.13,s.17

Thank you for your prompt attention to this matter.”

Sincerely

**Scott, Melissa AGRI:EX**

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**From:** Mack, James AGRI:EX  
**Sent:** Monday, December 1, 2014 9:47 PM  
**To:** Steward, Lonny AGRI:EX  
**Cc:** Wong, Jane T AGRI:EX; Scott, Melissa AGRI:EX; Parnell, Grant AGRI:EX  
**Subject:** RE: poultry disease insurance

s.13,s.17

*James Mack  
Assistant Deputy Minister  
Agriculture Science and Policy, Ministry of Agriculture  
Phone: 250-356-1821  
[james.mack@gov.bc.ca](mailto:james.mack@gov.bc.ca)*

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**From:** Steward, Lonny AGRI:EX  
**Sent:** December 1, 2014 1:59 PM  
**To:** Mack, James AGRI:EX  
**Cc:** Wong, Jane T AGRI:EX; Scott, Melissa AGRI:EX; Parnell, Grant AGRI:EX  
**Subject:** poultry disease insurance

I just got off the phone with Garnet Etsell regarding the start-up of their captive insurance company. Their position has changed somewhat from previous discussions. As they are set to meet with Minister Letnick this week I thought he should be made aware of their most current position.

s.13,s.17

Please call to discuss. 250 861-7204

Page 14

Withheld pursuant to/removed as

DUPLICATE

## Scott, Melissa AGRI:EX

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**From:** Mack, James AGRI:EX  
**Sent:** Friday, October 17, 2014 5:10 PM  
**To:** Scott, Melissa AGRI:EX  
**Cc:** Anderson, Heather L AGRI:EX; Standish, Alana AGRI:EX  
**Subject:** FW: AI insurance

Melissa

Can you set up time next week for me on this topic with appropriate staff in the ministry. Heather<sup>s.22</sup> and knows who should be there.

I need to know where our thinking is at on the proposal below and how we can respond prior to the meeting on the 30<sup>th</sup>.

*James Mack  
Assistant Deputy Minister  
Agriculture Science and Policy, Ministry of Agriculture  
Phone: 250 350 1871  
james.mack@gov.bc.ca*

---

**From:** Ray Nickel<sup>s.22</sup>  
**Sent:** September 13, 2014 1:23 PM  
**To:** Mack, James AGRI:EX  
**Cc:** 'Harvey Sasaki'; 'Allen James';<sup>s.22</sup> : 'Brian Red'; Bruce Apperloo; 'Dan Kampen'; Derek Janzen;  
<sup>s.22</sup> : Hester Mulder; 'Jake Esau'; 'Joe Neels'; Kerry Froese; 'Ravi Bathe'<sup>s.22</sup> ; 'vic  
Red'; walter siemens  
**Subject:** AI insurance

Hi James,

We appreciated the opportunity to have a follow-up conference call after our brief visit to Victoria on Aug 28<sup>th</sup>. The BCPA met on Sept the 9<sup>th</sup> and had further discussion around some of the comments and suggestions made at our meeting together and the conference call. The association would like to work with the ministry for purposes of having the mandatory insurance program go ahead, but with the intention of it being able to manage risk around a low path AI diagnosis.

This continues to point towards a captive insurance vehicle especially if it will also allow the industry to save premium costs in the long run.

The following are recommendations coming out of the meeting for your consideration:

s.13,s.17

Look forward to your response

Sincerely

Ray Nickel  
President, British Columbia Poultry Association



**From:** [Parnell, Grant AGRI:EX](#)  
**To:** [Hall, Kim AGRI:EX](#)  
**Subject:** FW: background poultry august 28  
**Date:** Friday, January 23, 2015 12:45:28 PM  
**Attachments:** [poultry meeting August 2014.docx](#)  
[13-10-26 Insurance product development IAMC-IAF Presentation v 3.pptx](#)

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Grant Parnell, ADM

Ministry of Agriculture

250 356 1122

250 356 7279 (fax)

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**From:** Steward, Lonny AGRI:EX  
**Sent:** Tuesday, August 26, 2014 9:06 AM  
**To:** Parnell, Grant AGRI:EX; Mack, James AGRI:EX  
**Cc:** McLaren, Solveig AGRI:EX; Falk, Gary AGRI:EX; Delowsky, Tracey AGRI:EX; Coney, David AGRI:EX  
**Subject:** background poultry august 28

Attached is background info for Thursday's poultry meeting

**From:** [Parnell, Grant AGRI:EX](#)  
**To:** [Hall, Kim AGRI:EX](#)  
**Subject:** FW: MNL meeting with the Poultry Assoc.  
**Date:** Friday, January 23, 2015 12:44:20 PM

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Grant Parnell, ADM  
Ministry of Agriculture  
250 356 1122  
250 356 7279 (fax)

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**From:** Parnell, Grant AGRI:EX  
**Sent:** Friday, December 5, 2014 12:30 PM  
**To:** Sturko, Derek AGRI:EX; Mack, James AGRI:EX; Nickel, Ken AGRI:EX; Patterson, Mat AGRI:EX  
**Subject:** FW: MNL meeting with the Poultry Assoc.

s.13

Here are the e-mail addresses for those that were present:

Ray Nickel (BCPA President)	s.22
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Ravi Bathe (BC Chicken Growers Assoc)	<a href="mailto:ravi@randrfarmsltd.ca">ravi@randrfarmsltd.ca</a>
Steve Heppell (BC Turkey Growers Assoc)	<a href="mailto:steve@sheppell.ca">steve@sheppell.ca</a>
Garnet Etsell (BC Turkey Growers Assoc)	s.22
Dan Kampen (BC Egg Producers)	<a href="mailto:doubledfarms@shaw.ca">doubledfarms@shaw.ca</a>
Bryan Brandsma (BC Hatching Egg Producers)	s.22

Grant Parnell, ADM  
Ministry of Agriculture  
250 356 1122  
250 356 7279 (fax)

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**From:** Nickel, Ken AGRI:EX  
**Sent:** Friday, December 5, 2014 8:56 AM  
**To:** Parnell, Grant AGRI:EX  
**Cc:** Botkin, Clayton AGRI:EX; Schur, TJ AGRI:EX  
**Subject:** MNL meeting with the Poultry Assoc.

Grant

The Poultry Associations met with the Minister and DM on Wednesday. They raised the following issues:

1. They handed MNL a letter (Karen to CLIFF, we will need to respond) pertaining to their interest in an Agri-Recovery claim for the current AI event and in which they offered their immediate assistance in compiling economic impact information.
2. They discussed how the slow issuance of new production allocations cost the industry \$millions each year. Implied FIRB could improve this.
3. The Chicken Marketing Board structure is a concern and they recommended it be changed to have mostly elected producer members rather than the current 2 grower / 3 appointee model.
4. They discussed their Captive insurance plans and indicated they were at an impasse and either needed FIRB support to use seed money collected by the feather boards or they required \$2.3M from the province to capitalize a new program.
5. They repeated that they wanted immediate provincial action on initiating an Agri-Recovery file with AAFC.
6. They also expressed their displeasure with the amount of time it was taking to destroy the diseased birds on the infected premises currently under quarantine. At the time the CFIA destruction orders had not yet been issued.

s.13

Ken

Ken Nickel, M.Sc., P.Ag.  
Director - Sector Development Branch  
BC Ministry of Agriculture  
1767 Angus Campbell Rd, Abbotsford BC V3G 2M3

(604) 556-3103

## **BACKGROUND**

### **re: FIRB Supervisory Review Decision, Mandatory Poultry Insurance**

The order by the BC Farm Industry Review Board (FIRB) directing poultry marketing boards not to use their authority to enable mandatory poultry insurance does not diminish the original rationale for creating such a program. It should be expected the poultry sector will approach the Ministry for alternative ways to enable poultry disease insurance.

Insurance is the last piece of a four part integrated strategy (bio-security, emergency response, surveillance, and insurance) for the sector to manage against avian influenza. The Ministry has supported and Ministry personnel have been involved through the development of the strategy including the insurance component. A brief history and description of the strategy development and implementation is contained in a presentation (attached) made to the Investment Agriculture Foundation fall of 2013.

### **Mandatory vs. Voluntary**

The poultry sector worked collaboratively with two reinsurance companies through the development of the insurance products. It is clear that a mandatory program will have substantially lower premium costs than a voluntary program. The coverage and premium revenue of a mandatory program are more predictable attracting favorable reinsurance arrangements. Reinsurers indicated that without a mandatory program it is highly unlikely the sector could access reinsurance. Without a mandatory program industry will look to government to help backstop a voluntary program.

### **Industry Owned and Operated**

Extensive research was conducted on different ways insurance could be offered to poultry producers. Industry ownership of the insurance program has numerous advantages;

- retention of premiums within the sector
- ownership of the risk encourages low risk behavior
- program design tailored to BC conditions
- strong linkages with bio-security, surveillance and emergency response

Marketing Boards collecting premiums is viewed as an effective way to enforce mandatory participation as well as having a very low overhead cost. In addition to premiums the insurance proposal included using Marketing Board contingency funds and levies to build an initial capital fund to enable a degree of risk retention and reduce the amount of reinsurance required. The amount of initial capital has a profound effect on the cost of annual premiums.

Industry carefully weighed the pros and cons of various structures. An association captive is considered the best suited. It eliminates the financial risks to individuals from disasters that reciprocals and cooperatives contain and captives provide for clear ownership and accountabilities. The proposed captive is to be owned by the poultry producer associations.

## **National and Provincial Business Risk Management Policy**

Governments have been striving to move away from income support and supplementation. This is being accomplished by reducing the support of reactive programs (AgriStability and AgriInvest) in favour of more predictable insurance based programs.

Governments are also trying to realign the roles and responsibilities for risk management between industry, individual producers and governments. Governments are more clearly focused on protection against disasters while industry is encouraged and enabled (AgriRisk Initiatives) to develop and implement more specialized risk management products.

The poultry sector embraced these policy directions and has worked to take the lead for risk management. In the absence of an insurance program the Ministry will incur costs for losses in the AgriStability program and will be pressurized for an AgriRecovery response. Neither of these programs is timely or specific enough to help bring the industry back into production quickly. They also do not offer the predictability needed to help lever investment or promote producer cooperation with proactive disease surveillance.

### **Next Steps**

The poultry sector has pioneered in BC an industry led risk management product development that could generate clear benefits for industry and governments. Industry has been aware that the regulatory authority of the marketing boards may be inadequate to enable mandatory insurance and to collect premiums through a levy. s.12,s.13,s.14  
s.12,s.13,s.14

Prepared by: Lonny Steward      250 861-7204

August 25, 2014.

# BC Poultry Captive Insurance Company Inc.

Interagency Management Committee  
Investment Agriculture Foundation  
October 25/November 5, 2013

# *Outline*

- ▶ History Lesson
- ▶ What was Learned
- ▶ Investments to date
- ▶ What has been done
- ▶ What will it lead to
- ▶ Roles and responsibilities
- ▶ What needs to be done



# A History lesson

## » Avian Influenza

## ***2004 - 17 Million Birds Destroyed***

- ▶ **Industry operations suspended ~ 5 months**
  - **Confirmation of HPAI – February 16**
  - **Repopulation commences – July 9**
- **Government cost**
  - **>\$90 million**
- **Industry cost - \$391.2 million**
  - **Direct impact - \$222.6 million**
  - **Indirect impact - \$161.1 million**
  - **One-time loss - \$7.5 million**
- **Recovery period - > 2-5 years**

# *Additional NAI Discoveries*

- ▶ 2005 LPAI – BC ducks
- ▶ 2006 LPAI – PEI geese
- ▶ 2007 HPAI – SK broiler hatching egg
- ▶ 2009 LPAI – BC turkeys
- ▶ 2010 LPAI – MB turkey breeder

# *Lessons Learned*

## *Need for Early Detection & Rapid Response*

- ▶ Consider Pre-emptive culling
- ▶ Improved biosecurity protocols and measures
- ▶ Improved premise identification systems and information sharing protocols
- ▶ Review of compensation policies and protocols
- ▶ Review dead bird disposal strategy
- ▶ Implement active surveillance
- ▶ Collaborative effort of BC industry and government to further mitigate future risks

# Investments to date

» Public Private  
Partnership

# *Foundation's \$500,000+ Investment*

- ▶ A0437 – Economic Impacts on BC Poultry Industry (Serecon 2004)
  - \$50,677
- ▶ AIP 001 – Risk Analysis of the BC Poultry Industry (Serecon 2007)
  - \$117,946
- ▶ AIP 005 – Delivery Model Assessment (Marsh 2010)
  - \$18,000
- ▶ AIP 006 – Insurance Model (Serecon 2009)
  - \$17,869.75
- ▶ AIP 007 – Insurance Product Design (Agri-Saki 2011)
  - \$24,639.51
- ▶ AIP 008 – LQM Update and Presentation (Serecon 2011)
  - \$10,621.69
- ▶ AIP 009.01 – Management of Insurance Product Development (Agri-Saki 2012/13)
  - \$132,200
- ▶ AIP 009.02 – Insurance Product Development (Aon Benfield 2012/13)
  - \$114,780
- ▶ AIP 009.03 – Captive Management Services (Aon Risk Solutions 2012/13)
  - \$39,200
- ▶ AIP 009.04 – Actuarial Assessment of Captive (JS Cheng 2013)
  - \$38,700

# *Other Contributions*

- ▶ Federal Private Sector Risk Management Partnership
  - \$392,933
  - North American Disease Spread Model
  - Risk Rating
- ▶ Endurance Re – Risk Rating Model
  - Pro bono, in-kind
- ▶ Industry
  - Producer leadership and participation
  - Captive incorporation and registration costs

# What has been Done

» Strategic Risk  
Planning



# *Drivers for Mitigating Risk*

## *Initiated by the BC poultry industry:*

- ▶ *2004 – Economic Impacts on the British Columbia Poultry Industry Due to the Avian Influenza Outbreak*
- ▶ *2007 – Risk Analysis of the BC Poultry Industry*
- ▶ *2009 – Setting the Foundation for Developing Poultry Insurance in BC*
- ▶ *2009 – A Strategic Plan for Risk Mitigation of Avian Influenza in BC Poultry*
- ▶ *2010 – Review of Risk Financing Options to Insure Avian Influenza for the British Columbia Poultry Industry*

# *An industry government partnership*

- ▶ Poultry Industry Biosecurity/Emergency Response Strategic Plan
  - Mandatory and auditable biosecurity program
  - Emergency response management plan
  - Effective and comprehensive risk management program
- ▶ Federal and Provincial funding support to implement
- ▶ Continued Industry Government Partnership
  - Poultry Industry Advisory Management Committee
  - The “Ramada” Group
  - Risk Advisory Steering Committee/Risk Mitigation Steering Committee

# *The Problem*

- ▶ Facilitate Recovery
  - Minimize industry disruption
  - Resume of production in as short of time possible
- ▶ Facilitate Early Detection
  - Proactive surveillance versus prevalence testing
- ▶ Risk of Exposure remains high
  - Pacific Flyway – waterfowl hosts
  - Recent discoveries in Australia, Netherlands, Italy and Mexico
  - Continued prevalence in Asian countries

# *How we got to this point*

## ***A comprehensive, industry-led process***

- ▶ Risk assessment and loss quantification
  - “Do the conditions for insurability exist?”
  - North American Animal Disease Spread Model
  - AI Spread Model
  - Loss Quantification Model
  - Rating Model and Risk Assessment
  - Actuarial Analysis
- ▶ Established
  - Expected annual losses
  - Risk by sector
  - Premium tables by sector
  - Policy wording, including compliance factors, exclusions and deductibles

# What it leads to

## » Risk Response

# *Comprehensive four part, Integrated Strategy*

- ▶ **Mandatory Biosecurity** – to minimize risk of infection and transfer
- ▶ **Compulsory Surveillance** – proactive detection to enable early response and containment
- ▶ **Emergency Response** – to dovetail with CFIA to ensure timely response, containment and eradication
- ▶ **Insurance** – to ensure adequate compensation and timely recovery

# *Missing component of the strategy*

## **A Captive Insurance Company**

- ▶ Four regulated poultry association shareholders
  - Four association appointed voting directors
- ▶ BCPA appointed non-voting Chair
- ▶ Option for up to two additional non-voting directors
- ▶ Captive Management Services
  - Aon Risk Solutions

# *Industry is only as strong as its weakest link*

- ▶ Maintain discipline and commitment within the industry
  - Transition to Proactive Risk-based Surveillance
  - Early detection, containment and eradication of NAI
  - Regulated sectors operating under a shared risk management scheme
- ▶ Limitations of other mechanisms
  - Self-insurance
  - Private sector
    - Very limited availability
    - Control vested outside BC poultry industry
  - Reciprocal/Mutual insurance schemes

***Industry ownership and retention of profits from the insurance company for the benefit of the industry***



# *Insurance Policy*

## ► Covered

- Four regulated associations and by extension of membership to registered licenced quota holders
  - Broiler Hatching egg producers
  - Chicken producers
  - Egg Producers
  - Turkey Producers

## ► The Peril

- Notifiable Avian Influenza (NAI)
  - Any Highly Pathogenic AI
  - H5 or H7 Low Pathogenic AI



# *Premiums*

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# *Claims and Indemnities*

- ▶ In the event of CFIA confirming NAI, the “infected premise” would be eligible to file a claim to their association for:
  - **Mortality loss** which would be a payment based on the number of birds ordered destroyed by CFIA, the age of the bird and the weekly value of the bird.
  - **Cleaning and Disinfection Costs** which is based on a fixed per bird value times the number of birds ordered destroyed.
  - **Business Interruption** in the event that the producer misses the next scheduled placement date, a fixed value per bird per week, up to the earlier of, the date of placement or eight weeks.
- ▶ The coverage includes a 10% deductible
  - the producer receive an indemnity payment of 90% of the value of the coverage provided.
- ▶ All payment calculations will be based on the CFIA number of birds ordered destroyed.

# Roles and responsibilities

## » The Players

# *Associations*

- ▶ Take ownership of the insurance program and its implementation
- ▶ Fully embrace and endorse the fourth and final element of the four-part industry risk mitigation strategy
- ▶ Appoint directors
- ▶ Sponsored member plebiscites to secure important producer feedback on the acceptability of the insurance program
- ▶ Establish the governance structure and the scope of powers of the captive
- ▶ Secure the required capital for the captive insurance company
- ▶ Balance sector specific needs with the collective interests of the regulated poultry sector

# *Boards and Commission*

- ▶ Subject to positive outcome of FIRB Supervisory Review
  - Establish general order making disease insurance compulsory
  - Implement levy for annual premium payments
  - Transfer shareholder equity and shareholder capital to associations
- ▶ Provide associations with annual quota allocations
- ▶ Support claims adjusting

# *Captive Directors*

- ▶ Represent and advocate sector shareholder interests
- ▶ Balance and temper sector shareholder interests with those of the collective regulated poultry industry
- ▶ Report regularly to sector shareholder, seeking direction and clarification as required on all matters pertaining to the development and operation of the captive
- ▶ Provide directions to the contractors, RMSC, Aon Risk Solutions, Aon Benfield and other outside sources of expertise as required to deliver the insurance product and operationalize the captive

# What Needs to be done

» Unfinished  
Business



# *Incorporation and Registration*

- ▶ Incorporation of the Captive
  - Shareholders Agreement
  - Association Ratification
- ▶ Registration with the Financial Institutions Commission
  - Appoint an Auditor
  - Appoint a Banker and Investment Manager
  - Appoint a Reinsurance Broker
    - Develop a Reinsurance Program
  - Develop operating policies and procedures
  - Establish claims adjudication and processing procedures
  - Finalize policy wording

# *Continued Industry Engagement*

s.13,s.17

# *FIRB Supervisory Review of Poultry Insurance*

- ▶ Complete the Joint Submission for the Boards and Commission
- ▶ Boards and Commission to enlist stakeholder feedback on Submission
- ▶ Submission to FIRB
- ▶ Respond to comments and questions on the Joint Submission
- ▶ Respond to questions relating to Phase 2 of the Review

# In the “Red Zone”

## » The Ask

# *Requirements – \$70,000*

- ▶ Actuarial Assessment
  - Further run based on revised coverage
    - JS Cheng – \$16,000 (including GST)
    - Serecon – \$1,600 (including GST)
- ▶ Captive Management
  - Aon Risk Solutions – sufficient funding in place
- ▶ Project Management
  - Agri-Saki – \$52,400

# *Rationale for the Ask*

- ▶ Risk of discovery remains high
  - Nearly 10 years since last HPAI, 4 years since LPAI
  - Recent HPAI discoveries in Australia, Netherlands, Italy and Mexico
  - Continued pandemic in Asia
- ▶ Producers need assurance for losses not covered by CFIA and *Health of Animals Act*

s.13

# *Unforeseen Circumstances*

- ▶ Corporate changes
  - Risk Advisors (BMS → Aon Benfield)
  - Risk Modelling (Endurance Re)
  - Non-disclosure/non-compete clauses → incomplete documentation
- ▶ Level of support
  - Plebiscite results in Chicken lower than expected requires additional follow-up
    - Re-evaluate coverage and risk
- ▶ Supervisory Review
  - Comprehensive and time consuming documentation requirements
  - Precludes the boards and commission from advancing funds for the start-up of the Captive.

## *Consistent with Government Policy Direction*

- ▶ Poultry Captive – A Working Model
  - Growing Forward 2 Business Risk Management policy direction
    - Industry to assume greater responsible for managing risk
    - Facilitate industry solutions
- ▶ Result, BC Poultry Industry
  - Capacity to be in control
  - Security commensurate with risk
  - Responsive to needs
  - Trusted purveyor of insurance



**Letnick, Norm AGRI:EX**

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**From:** Letnick, Norm AGRI:EX  
**Sent:** Tuesday, November 4, 2014 1:33 PM  
**To:** Sturko, Derek AGRI:EX  
**Subject:** Re: Npma

Thank you!

Norm Letnick, MLA  
Minister of Agriculture  
s.13,s.17

Page 58 to/à Page 61

Withheld pursuant to/removed as

s.12;s.14;s.13



September 3, 2014

File: 44200-70 POULTRY INS

**DELIVERED BY E-MAIL**

Ray Nickel  
President  
BC Poultry Association  
PO Box 70 Mt Lehman Station  
Abbotsford BC V4X 2P7

Garnet Etsell  
Chair  
BC Poultry Captive Insurance Company Inc.  
c/o PO Box 70 Mt Lehman Station  
Abbotsford BC V4X 2P7

Dear Sirs:

**SOUND MARKETING POLICY AND BOARD AUTHORITY – MANDATORY POULTRY DISEASE INSURANCE**

I have been directed to respond to your letter of August 29, 2014 to Honourable Norm Letnick, Minister of Agriculture. Thank you for copying the BC Farm Industry Review Board (BCFIRB), providing this board with the opportunity to confirm its position in support of future discussion related to the subject.

As BCFIRB has already communicated, a captive insurance company that does not involve the exercise of authority under the *Natural Products Marketing (BC) Act (NPMA)* would be outside the jurisdiction of BCFIRB and the poultry boards. Because the captive insurance company proposal calls for such an exercise of authority, BCFIRB is involved as the provincial supervisory board.

Does mandatory insurance fall within the poultry boards' legal authority? In BCFIRB's view, there is a significant degree of uncertainty as to whether any form of mandatory poultry insurance is currently authorized under the *NPMA*. The uncertainty increases in regards to the captive insurance proposal which BCFIRB has found to be clearly not contemplated by the *NPMA*.

In its August 14, 2014 decision (and earlier correspondence), BCFIRB acknowledged that insurance is an important risk management tool for producers and recognized that insurance can be part of sound marketing policy. However, after having to commit considerable time and resources to carefully review the proposal, BCFIRB found that there were significant outstanding policy and legal questions at many levels – within the regulated poultry sector and within government – that need to be answered before BCFIRB could potentially find under the *NPMA* that poultry boards participating in the

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**British Columbia  
Farm Industry Review Board**

**Mailing Address:**  
PO Box 9129 Stn Prov Govt  
Victoria BC V8W 9B5  
Telephone: 250 356-8945  
Facsimile: 250 356-5131

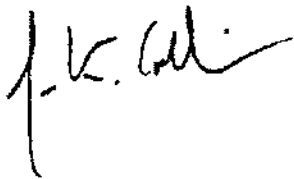
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Victoria BC V8W 2H1  
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Website: [www.firb.gov.bc.ca](http://www.firb.gov.bc.ca)

proposed formation and operation of a captive insurance company accords with sound marketing policy. In BCFIRB's view, there are overarching policy and legislative questions for government.

BCFIRB's order to the poultry boards to not exercise their regulatory authority under their schemes at this time for the purpose of supporting the proposed captive insurance company was issued on the basis of these legal and sound marketing policy findings.

As noted in the August 14, 2014 decision, BCFIRB is prepared to work with the poultry boards it supervises in discussing with the Ministry of Agriculture the role of boards with respect to insurance in the regulated sector and potential legislative amendments to the *NPMA*. BCFIRB is also prepared to meet with other stakeholders as may be required to clarify its direction pending the outcome of careful legal and policy scrutiny.

Yours truly,



Jim Collins  
Executive Director

cc: Honourable Norm Letnick  
Minister of Agriculture

Derek Sturko, Deputy Minister  
Ministry of Agriculture

Grant Parnell, Assistant Deputy Minister  
Ministry of Agriculture

James Mack, Assistant Deputy Minister  
Ministry of Agriculture

Casey Langbrock, Chair  
BC Broiler Hatching Egg Commission

Robin Smith, Chair  
BC Chicken Marketing Board

Richard King, Chair  
BC Egg Marketing Board

Ralph Payne, Chair  
BC Turkey Marketing Board



PO Box 70 Mt Lehman Station Abbotsford, V4X 2P7

August 29, 2014

via email - AGR.Minister@gov.bc.ca

Honourable Norm Letnick  
Minister of Agriculture  
PO Box 9043 STN PROV GOVT  
Victoria, BC  
V8W 9E2

Dear Minister Letnick:

We are writing with the hope that you are willing and able to provide clear policy direction and create the business environment, in which the regulated poultry industry in British Columbia can succeed in managing the disease risk of Notifiable Avian Influenza (NAI).

Poultry industry representatives met on August 19<sup>th</sup>, 2014 with John Lee and Jim Collins of the British Columbia Farm Industry Review Board (BCFIRB) and on August 28, 2014 with Ministry executive and staff. Both meetings were focused on trying to make sense of the recent BCFIRB Supervisory Review decision regarding mandatory poultry disease insurance. The BCFIRB decision directed poultry boards not to exercise their regulatory authority for the purposes of supporting the proposed poultry captive insurance company.

Despite the meetings with BCFIRB and Ministry staff, the regulated poultry sector remains perplexed by the apparent contradictions in government policy. On one hand, there is clear policy direction for industry to accept increased responsibility for managing risk, in contrast the government's supervisory body directives, are refusing to allow the risk management policy objective.

We did not leave these meetings with any concrete assurances that we could count on support from the Ministry or BCFIRB. The regulated poultry industry is committed to completing its integrated four-part risk mitigation strategy that would reduce the occurrence, transmission and impact of contagious poultry diseases in British Columbia. **We are confused by recent proposals from the Ministry and BCFIRB requiring industry to pay for supervisory/regulatory oversight as being a high priority; but, somehow enabling changes to reduce government financial risk and liability from unforeseen and uncontrollable risks affecting producers, that could be insured, appears to be of limited to nil priority.**

The regulated poultry sector has taken the Avian Influenza outbreaks in British Columbia seriously; demonstrated its leadership, applied due diligence, and accepted its role and responsibilities for poultry disease management. Since 2004, the regulated poultry industry in British Columbia has led the development of a practical and workable approach to managing the risks of NAI that have been adopted nationally. The work of the BC poultry industry has been recognized by Agriculture and Agri-Food Canada and the Canadian Food Inspection Agency.

Thanks to government program funding support of over \$3.5 million since 2004, significant progress can be reported on our risk mitigation strategy. Enhanced mandatory biosecurity and emergency response systems are in place. Despite these actions, the risk of a NAI discovery is no less today than in 2004 when 17 million birds were ordered destroyed.

Industry felt it was on the verge of realizing the final two strategic elements, proactive surveillance and insurance (compensate producers for extraordinary costs), not covered by the federal *Health of Animals Act* for discoveries of NAI. As a result of the BCFIRB decision, industry is highly doubtful that any further progress can be made without immediate action and direction from yourself as Minister. The poultry industry has received encouragement and timely support of the Ministry of Agriculture in the past, with valuable input and direction provided from Ministry Executive and staff at the technical level to enable the development of these practical and workable approaches. Interpretations made by BCFIRB and legal authorities concerned with the *Natural Products Marketing Act* and the apparent lack of evidence that mandatory disease insurance is consistent with sound marketing policy, have pre-empted the successful conclusion of the poultry disease risk mitigation strategy.

We recognize that you cannot fetter BCFIRB's discretion however, you as Minister can set clear policy direction to create the business environment whereby industry can take ownership and assume the responsibility to effectively and efficiently manage its disease risk. The poultry industry has done its due diligence and is ready to proceed, but it is not willing to wait for an indefinitely period of time to achieve its strategic goals for disease risk mitigation. The industry is not prepared to wait for two years for possible legislative changes to give BCFIRB greater comfort to support mandatory disease insurance.

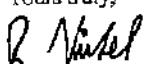

The BC Poultry Captive Insurance Company is ready to finalize its application for registration with the BC Financial Institutions Commission and provide registered poultry producers with insurance for NAI. There is no comparable private sector insurance producer available. The Captive has offers on hold from private sector reinsurance companies willing to back-stop catastrophic losses due to NAI. We need your support in placing a high priority within the Ministry of Agriculture to find the ways and means to make the Captive operational over the next 3 to 6 months.

The BC Poultry Association will be meeting on Tuesday, September 9, 2014 to assess options and make recommendations to its member organizations regarding whether to continue or not with the development and implementation of mandatory disease insurance. We need a clear commitment Minister Leisnick that your Ministry will work in the timely manner necessary to facilitate and enable the required business environment for the BC Poultry Captive Insurance Company to succeed.

The regulated poultry sector across Canada as well as the rest of the BC agriculture industry is closely watching the development of the poultry insurance model. The inability to proceed with implementation will not inspire other sectors within BC or across Canada to support the federal/provincial/territorial governments' policy for industry to accept greater responsibility for managing risks. This will leave governments in the position of continuing to carry responsibility for supporting industry losses.

The BC poultry industry would be pleased to meet with you at your earliest convenience to hear how you and your Ministry can assist us in collectively and collaboratively realizing public policy objectives.

Yours truly,

Ray Nickel

Garnet Etsell

President

Chair

BC Poultry Association

BC Poultry Captive Insurance Company Inc.

c.c.        Derek Sturko, Deputy Minister  
Grant Parnell, Assistant Deputy Minister  
James Mack, Assistant Deputy Minister  
John Les and Jim Collins, BC Farm Industry Review Board  
Regulated Poultry Board General Managers and Executive Directors

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