

QUOTA ASSESSMENT TOOLS EVALUATION

Submission Document June 30, 2017 BC Egg Marketing Board

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Executive Summary:

The BCFIRB has invited all supply managed commodities to review the outcomes of the 2005 Specialty Review to determine if industry and public interest policy outcomes are still being achieved and if there are unintended or adverse consequences that need to be addressed.

The consultation process started in February 2017 with a joint meeting between BCFIRB and the supply managed commodities. The policy objectives were defined and a public consultation starting point was developed. From there, the BCEMB held two rounds of consultation. The first was to assess the effectiveness of the LIFO 10/10/10 policy as well as the 5% transfer assessment policy. The second consultation was to determine which alternative, if any, would best suit the needs of the industry while still meeting the 2005 Policy Objectives. Throughout both rounds of consultation, the BCEMB discussed review findings and potential solutions with the other commodity boards and commission.

From the producers' perspective, the BCEMB heard that rapid and sustained growth in conjunction with the LIFO 10/10/10 policy has provided a substantial financial disincentive for producers who are interested in downsizing or exiting the industry. As a consequence, there is an exaggerated disparity between the quota available and the quota sought. This situation, as well as the loss of transferable quota due to the assessments, is contributing to increases in quota value.

The Board received similar comments throughout the producer community and we found that the comments did not differ significantly across farm size or region.

The financial institutions would like to see their clients with the ability to utilize their assets at their fullest potential and are supportive of any change that would result in increased transferability.

The grading stations want to see the quota in production, not held in the reserve.

As a result of the review, the BCEMB is requesting approval for the following changes:

- 1) Remove the LIFO 10/10/10 Policy on growth issuances and continue with the BCEMB requirement that states producers do not receive their growth issuance until the hens are placed in their barn.
- 2) Remove LIFO 10/10/10 for incentive quotas such as those issued under the New Producer Program and replace it with a 10 year 0% transferability policy. After 10 years, the quota becomes base quota and the producer is no longer classified as a new producer.
- 3) Remove the direct 5% Transfer Assessment Policy and replace it with a Reserve Responsive Assessment that takes into account the amount of quota currently held in the reserve and how much is required for the New Producer Program.
- 4) Expand the transfer assessment exemption list to include
 - a. Child to parent
 - b. Sibling to sibling
 - c. Grandparent to grandchild
 - d. Aunt/Uncle to nieces and nephews
 - e. Long-standing farm managers
- 5) Apply the policy changes on all quota (past, present, future) with no retroactive adjustments.

Throughout this document, you will note that our decisions are guided by the SAFETI principles. Even though they may not be explicitly stated, they are inherent in the nature of the analysis.

Background and Current Situation:

The 2005, BCFIRB published the Specialty Review which includes the policies, analyses, principles and directives that the supply managed commodities were directed to implement. One of those directives was for the Boards to implement the LIFO, 10/10/10 policy. This policy has now been in place for 12 years and over the last few years, it has become apparent that it may be time to review these policies to ensure that they are continuing to meet the objectives outlined in the 2005 Review.

As part of the review process, BC FIRB has requested that each of the Boards complete a consultation with their stakeholders regarding the policy and possible changes as well as provide a qualitative and quantitative analysis of the policy.

A. Allocation

The BCEMB administers one type of quota that is used to produce multiple product types. These product types range from conventional to specialty housing including free run, free range and organic. When quota is issued to the provinces from Egg Farmers of Canada, the BCEMB must have the allocation process approved by BCFIRB prior to issuing it to producers. The BCEMB is currently placing 10% of any new issuances in the reserve for new entrants prior to distributing the remainder pro-rata to producers. In the fall of 2017, the BCEMB will consult with producers and stakeholders to determine if this is the best method for issuing quota.

Since 2005, the BC egg industry has had seven issuances of quota, all of which have been issued in the last 8 years. This means that all of our producers have some issuances that fall under the 10/10/10 category. If any of these producers were to transfer a portion of their quota today, they would lose 15-20% of their quota value due to assessments. This has created a significant impact on the movement of quota. Every week the BCEMB has at least one producer who requests to know how much quota would be assessed if they sold either some or all. Upon receiving the answer from the BCEMB, they no longer entertain the thought of selling.

Anytime an "assessment", "tax" or "penalty" is applied to a transaction, any business person is going to look at whether it is beneficial long term to do so. Given the circumstances today, after multiple new allocations, if a person is going to do anything with their quota, these "assessments" will most certainly kill any potential deal.

B. Current Egg Market Conditions

The table egg industry has seen very rapid growth in the last few years due to increased egg consumption as well as a steady shift from conventional to specialty products. In 2005, the BCEMB had 20 producers using their quota to produce a specialty production type, representing 2.5% of the industry. In 2017 there are 61 producers representing 23% of our overall egg production. This transition has occurred organically as the market has increased their demand for these production types. The grading stations have been instrumental in

ensuring that there is enough of each production type for the market and they transition producers as required. The flexibility for producers to move from one production type to another with minimal restrictions has also been key to this transition.

Recently, the Codes of Practice for Care and Handling of Layer Hens was updated; this update will require most of our producers to invest in barn upgrades. These upgrades can range from increasing the number of nest boxes or feed lines in a specialty system to a complete rebuild in the conventional systems. Approximately 65% of our hens will need to be moved from conventional to enriched or specialty housing in the next 20 years at a very significant cost to industry (\$75-\$100 per hen).

C. Industry Entry and the Quota Exchange

The BCEMB has had a quota exchange since 2007. The purpose of the exchange is to provide for growth and industry entry as well as to support existing producers while being flexible for all market types and be equitable in quota distribution.

In 2015, the BCEMB recognized that the current quota exchange was not working as it was intended. A full consultation was conducted with producers at that time and the exchange was updated to the current version of the program. This current exchange is working better and helping people enter the industry and/or obtain more quota. In 2016 and 2017, three exchanges occurred which resulted in 30 producers obtaining quota (eight new entrants, seven others under 6,000 quota units, 15 above 6,000 units). There is the opportunity for an exchange to be held every 3 months. At this time, they are being held less frequently as a result of producers not being willing to sell.

I believe the transfer assessments have led to an unnatural hording of quotas and resultant increase in quota prices. Availability of quota for the exchange is a barrier for entry and as a result of this consultation and review process, BC Egg is confident that this can be resolved through the recommended changes to the LIFO 10/10/10 policies.

A review of the Quota Exchange Program will be conducted in the fall of 2017 as it is currently a pilot program and BC Egg wants to ensure that the program continues to remain effective.

Policy Objectives:

The policy objectives used to guide the consultation are those outlined in the Quota Assessment Tools Evaluation – BCFIRB Expectations and Looking Forward document dated February 28, 2017. These policy objectives include:

1. 2005 Transfer Assessment and Industry Entry Related Policy Objectives

- a. Quota is intended to be produced
- b. Quota is transferrable
- c. Producers are actively engaged and committed to the industry
- d. Quota is available to commodity boards to support policy objectives, including development of specialty markets and providing for new entrants in the supply management system

2. 2004 Ministry of Agriculture Regulated Marketing Economic Policy

- a. Public Interest operate in the interests of all British Columbians
- b. National Systems National Systems are supported when they are consistent with the growth and prosperity of the agri-food industry
- c. Maintaining and Gaining Markets and serving BC demand –support the development of new markets
- d. Entry of New Producers –facilitate the entry of new producers to sustain and renew regulated industries in new and existing markets
- e. The Value Chain –facilitate cooperation among producers, marketing agencies, processors and retailers, with a view to achieving efficiencies throughout the entire system, and enhancing the marketplace
- f. Safety and Quality build consumer preference for BC product
- g. Recognition of Standards recognize and encourage producers to participate in the voluntary standards programs sanctioned by the Province and national standards sanctioned by the federal government as standards for identifying and labelling specialty products
- h. Regional Industries contributes to the economic activity and stability in all regions of British Columbia

3. SAFETI Principles

In addition to considering the above policies, any recommendation must also meet the following SAFETI Principles:

- a. Strategic Identify key opportunities and systemic challenges, and plan for actions to effectively manage risks and take advantage of future opportunities.
- b. Accountable Maintain legitimacy and integrity through understanding and discharging responsibilities and reporting performance.
- c. Fair Ensure procedural fairness in processes and decision-making.
- d. Effective A clearly defined outcome with appropriate processes and measures.
- e. Transparent Ensure that processes, practices, procedures and reporting on exercise of mandate are open, accessible and fully informed.
- f. Inclusive Ensure that appropriate interests, including the public interest, are considered.

Consultation Process:

The purpose of the consultation was to gather qualitative data to help determine if industry and public interest policy outcomes are being achieved to their fullest potential post BCFIRB's 2005 specialty review.

Before any recommendations were made, BCEMB wanted to go above and beyond to reach as many stakeholders as possible to determine if the policy and the policy objectives related to transfer assessments and industry entry are being fulfilled. If so, why and how, and if not, why not.

BCEMB's overall approach to the consultation was to leave the policy direction in the hands of our stakeholders, using their feedback to drive us towards a meaningful recommendation that is collectively supported by all interested parties. To do this, our consultation focused on open surveys and in-person meetings. BCEMB's staff and its BOD completed the following:

- In-person producer consultations #1
 - One (1) Interior meetings (Salmon Arm)
 - One (1) Lower Mainland meetings (Abbotsford)
 - One (1) Vancouver Island meetings (Duncan)
- One (1) in-person grader and processor meeting
- Four (4) in-person, individual meetings with major financial institutions (4 of 6)
- One (1) teleconference meeting with financial institution (1 of 6)
- In-person producer consultations #2
 - One (1) Interior meetings (Salmon Arm)
 - One (1) Lower Mainland meetings (Abbotsford)
 - One (1) Vancouver Island meetings (Duncan)
- One (1) review with legal
- Six (6) in-person meetings with supply managed boards
- Five (5) in-person meetings with BC FIRB

A summary of the analysis and notes derived from all the consultations listed above can be found in Appendix 2 of this document.

The first in-person consultation with producers took a scientific look at BCFIRB's 2005 speciality review with our stakeholders, exploring the scope, its outcome, and the quota assessment review that BCEMB was undergoing at the invitation of BCFIRB. Following the consultation, producers were invited to answer a survey with questions that elaborated on the themes that were discussed in the meeting. The details of this analysis can be reviewed in Appendix 3.

Using the survey responses that were received, the second in-person consultation discussed the results of the first survey and provided producers with potential solutions. Producers were later provided with a second survey that allowed the respondent to attach a score to each proposed solution, based on how well they felt the proposal would address both the policy objectives from the 2005 Specialty Review and the current scarcity of quota available to "shake loose" more quota in our industry. The details of this analysis can be reviewed in Appendix 4.

With potential changes in mind, we invited all six financial institutions associated with lending in the supply managed sector to a meeting. The meeting focused on the potential impact of our proposed changes. We heard from the financial institutions that they want their clients to have the ability to

utilize their assets at their fullest potential. As long as the board continues to let the market dictate the price of quota, banks are supportive of any change that results in a greater share of ownership at the producer level.

BCEMB also met with graders and our industry processor. As a "have not" province, they want to see quota in production. While they are supportive of industry entry, they want to ensure that it is done in a well thought out, economic, and efficient manner.

At various times throughout the entire process, BCEMB was in touch with our supply managed partners.

All supply managed boards met at the beginning and end of our consultation process. Five unique industries in five different situations talking about a few common policies that has affected each of our sectors differently. We discussed our approach, stakeholder feedback, and final policy recommendations as well as the differences and commonalities between our industries.

The supply managed sector most similar to ours is BC Milk. Although they presented their consultation to different stakeholders and approached their consultation in a slightly different manner, we came to a similar conclusion: that rapid growth in conjunction with LIFO and 10/10/10 has provided a strong disincentive towards the transferability of quota. As such, we came to many of the same proposed changes.

BCFIRB was invited to a Dropbox folder that included our stakeholder invitations, meeting notes, presentation documents, and preliminary data from our consultations. BCFIRB representatives also met with our Board Chair and Executive Director on multiple occasions throughout the consultation process.

Finally we had our legal representative review our proposed changes. If approved by BCFIRB, all of our proposed changes fully comply with current legislation, regulation, and agreements.

Current Quota Policies:

1. Producer Classifications

There are currently three classifications of producers in BC:

- a. Exempt Those persons in the province with 99 hens or less. These producers are exempt from the BCEMB regulations and do not require a permit or quota.
- b. Small Lot Permit Holders Those persons in the province with 100-399 hens. These producers must hold a permit with the BCEMB. They are introduced to the on-farm programs administered by the BCEMB and subject to SE testing on an annual basis. There is currently no restriction on the number of Small Lot Permits that may be issued. There is a limit of one permit per person per property and the permit can not be combined with quota.
- c. Registered Producers Those persons in the province with 400 hens or greater.

 These producers must hold quota and are subject to the BCEMB consolidated orders.

The policies being reviewed in this consultation directly affect all registered producers and indirectly affect those Exempt or Small Lot Permit Holders who may wish to obtain quota in the future.

2. Quota Distribution Policy Within and Between Types:

The BCEMB administers one class of quota. This class can be used to produce any production type from conventional to specialty. Producers are able to change production types provided they obtain grading station sign-off. A production type change request is submitted to the BCEMB for approval to ensure that all parties are aware of the production type change.

When a producer transfers quota through the quota exchange, they must complete an application form that includes the production type the quota was used for or will be used for. This form also requires grading station sign-off, ensuring the grading stations are aware of the production type and quantity they are potentially losing or gaining.

3. Quota Leasing Policies

There are currently two programs in the BCEMB Consolidated Orders that allow producers to obtain quota on a temporary basis either through leasing or a temporary allotment from the Board. These programs are integral to ensuring that quota is being produced while recognizing that there are some situations where the producer to whom the quota is intended may not be able to put it in production at the time of issuance.

A. Lease Between Registered Producers

Registered producers may lease their quota to other registered producers provided the lessor meets the following qualifications:

- 1. Is renovating, retooling or rebuilding an egg production unit
- 2. Has just purchased quota off the exchange

The lessee must maintain compliance with all requirements of the Consolidated Orders, have a production unit of adequate capacity and have enough hens to fully utilize his/her quota and the lease.

B. Temporary Allotment

On average, it takes BC egg producers two years to place 100% of a quota issuance once approval has been received from BCFIRB. In addition, a portion of each issuance needs to be held for the New Producer Program. The Temporary Allotment Program is an excellent tool to ensure that our EFC issued quota is active and in use when it cannot be used immediately by the intended recipient.

Registered producers may apply for a Temporary Allotment from the Board provided they meet the following eligibility requirements:

- 1. Have accepted and placed all EFC issued quota allocations
- 2. At the time of the lease application, have a quota credit balance that, if spread out over one year, represents a maximum of 10% of their allocated flock size.

The Alottmentee must maintain compliance with all requirements of the Consolidated Orders, have a production unit of adequate capacity, and have enough hens to fully utilize his/her quota and the additional allotment.

There is a Temporary Allotment fee of \$10 per hen on an annual basis for those registered producers participating in the program.

This program ran from June 2016 to June 2017. The BCEMB discontinued accepting new applicants in September 2016 when the Market Growth Allowance program was cut back. The program will remain within the Consolidated Orders to be used in the future if needed.

4. Quota Credit Policy

The current quota credit program was launched in August 1995 to address the health and safety concerns producers encountered when their flock number exceeded their allowable quota. It has enabled producers to meet certain challenges by introducing a degree of flexibility to the quota system, such as reducing the need for producers to sell excess birds prior to placing their flocks at nineteen weeks of age. The Quota Credit Program has since expanded and has proved to be an effective farm management tool. It has enabled BC Egg producers to utilize their quota to its full potential.

Registered producers may earn quota credits in the following situations:

- 1. Fowl Removal producers are encouraged to have a minimum 7 days of downtime between flocks. During this downtime, the BCEMB continues to bill levies even though the producer has no hens. Quota credits are earned on the levy being paid where the hens are not in production.
- 2. Short Placement In cases where a producer receives fewer hens than expected due to a poor hatch or poor performance in the pullet flock, they are eligible to receive quota credits for the number of hens they are below quota.

3. Unexpected mortality – If there is a challenge in the flock and the flock experiences higher than normal mortality (either 2% for a loss event or 5% for an ongoing challenge) producers are able to collect quota credits for the number of hens they are below quota.

A quota credit is earned at a rate of one quota credit per hen per week. These earned quota credits are then placed in a 'bank' for that producer to use on his/her next flock placement. Quota credits expire within five years of being earned and may be traded between registered producers.

Upon Board approval, producers can utilize their quota credits on hens placed above their total quota. They are used at a rate of one quota credit per hen per week. This allows producers to place over their total quota to maximize barn space and account for normal flock mortality.

5. Industry Entry

There are currently three ways in which a person can enter the table egg industry in BC:

1. New Producer Program

The New Producer Program was first developed after the 2005 specialty review in order to reduce the quota related barriers to entry. The program has been updated over the years and the most recent draw was held in January 2017. The BCEMB had previously committed to BCFIRB to start a minimum of two new entrants per year starting in 2009.

The process commences with the Board accepting applications for the program. Each application must include a number of items, including but not limited to a business plan, proof of financial suitability, an essay, and proof of residency. The applications are then reviewed and scored based on the requirements set out in Schedule 1 of the BCEMB Consolidated Orders. Applicants who achieve a score of 75 or greater are then entered into a random draw. Each new entrant drawn is provided with 3,000 quota units which are subject to the LIFO 10/10/10 quota assessment policy.

The New Producer Program is funded through quota transfer assessments and national quota allocations. The BCEMB is unable to allocate more quota to its producers than is allocated to BC by EFC. In order to fund the New Producer Program, the BCEMB must use quota that is already in existence. As illustrated later in this paper, the quota transfer assessments have not been successful at providing enough quota to fund the program so the BCEMB has withheld a minimum of 10% of each of the National Allocations. The BCEMB now has enough quota in the reserve for new entrants through to 2025.

2. Whole Farm Transfer

A new entrant may purchase a whole farm from a current producer. This requires the new entrant to purchase all of the quota as well as the land.

3. Quota Exchange

A new entrant may purchase quota off of the quota exchange. The new entrant is able to lease the quota to another registered producer for a maximum one year from the date of transfer in order to obtain production premises.

I think transfer assessments impact new entrants by limiting their ability to grow due to high quota value. Conventional producers are affected by the assessments by limiting their ability to sell some quota (without further penalties) to further invest in their operation.

6. Quota Transfer Assessment Policy and Procedures

A. Policy

- 1) Quota that was issued prior to 2005 is subject to a 5% assessment each time it is transferred
- 2) Quota that has been purchased by a producer is subject to a 5% assessment each time it is transferred
- 3) All quota issued pro-rata after 2005 is subject to a 10/10/10 transfer assessment the first time it is transferred, each subsequent transfer results in a 5% transfer assessment as per #2 above.
- 4) All incentive quotas given to new producers through the New Producer Program is subject to a 10/10/10 transfer assessment the first time it is transferred, each subsequent transfer results in a 5% transfer assessment as per #2 above.

This table	illustrates	the 10/10/10	assessment policy:

Anniversary	Years of	% to	% to
Date	Vested Interest	ВСЕМВ	Producer
Prior to 1st	0	100%	0
After 1st	1	90%	10
After 2nd	2	80%	20
After 3rd	3	70%	30
After 4th	4	60%	40
After 5th	5	50%	50
After 6th	6	40%	60
After 7th	7	30%	70
After 8th	8	20%	80
After 9th	9	10%	90

- 5) When determining what quota will be transferred when partial transfers occur, the BC Egg Marketing Board uses a Last In First Out (LIFO) policy whereby that last quota issued or bought is the first quota to be transferred.
- 6) Some types of transfers are exempt from the transfer assessment policy, these include:
 - a. When layer quota is transferred to a spouse, child or child and child's spouse

- b. When layer quota is transferred, via a whole farm transfer, to a sibling (all quota as well as the independent production unit)
- c. When the transfer results in all shareholders keeping the same proportionate share of the quota that they had prior to the transfer
- 7) A change in the proportionate ownership of quota amongst shareholders is classified as a transfer.

B. Procedures

This section illustrates how the BC Egg Marketing Board has interpreted the policy stated above for the purposes of implementing the quota transfer assessment policy. We will start with a sample farm (ABC Farms) and take a look at how different types of transfers will affect its quota holdings.

Producer: Total Quota	ABC Farms 12,274				
Allocation	# Special Allocation	Special Allocation			
Percentage	Birds Issued	Issued Date			
Base Quota	10,000	Sep-04			
3.00%	300	08-Nov-09			
3.46%	356	28-Nov-10			
3.25%	346	19-Oct-14			
2.70%	297	26-Apr-15			
2.65%	299	26-Jul-15			
2.587%	300	03-Apr-16			
3.148%	375	02-Apr-17			

1. Transfer of all quota to an exempt person (spouse, child, child and child's spouse) The ABC Farms owner has decided to transfer his entire quota to his son who is just starting out as 123 Farms. The ABC Farms owner starts as illustrated above and 123 Farms ends up with an identical quota split to what ABC Farms had with the same amount of time invested in the pro-rata issuances.

Producer: Total Quota	tal Quota 12,274				
Allocation Percentage	# Special Allocation Birds Issued	Special Allocation			
5					
Base Quota	10,000	Sep-04			
3.00%	300	08-Nov-09			
3.46%	356	28-Nov-10			
3.25%	346	19-Oct-14			
2.70%	297	26-Apr-15			
2.65%	299	26-Jul-15			
2.587%	300	03-Apr-16			
3.148%	375	02-Apr-17			

2. Shareholder proportional split

ABC Farms has two shareholders – Shareholder A has 70% ownership, Shareholder B has 30% ownership. ABC Farms decides to end its business relationship and each shareholder goes his/her separate ways forming two distinct Independent Production Units each with its own company names (AAA Farms and BBB Farms). Because they take their proportionate amount of quota, they are assessment exempt. (Both shareholders are leaving with the same proportionate amount of quota that they entered into business with).

Holdings before transfer:

Producer:	ABC Farms					
Transfer Date:	April-05-17					
Total Quota	12,274					
Allocation Percentage	# Special Allocation Birds Issued	Special Allocation Issued Date	Full Years Vested Interest	Assessment % At Today	Assessed: Return to BCEMB	# Birds Transferable
	10,000	Sep-04		5%	500	9,500
3.00%	300	08-Nov-09	7	30%	90	210
3.46%	356	28-Nov-10	6	40%	143	213
3.25%	346	19-Oct-14	2	80%	277	69
2.70%	297	26-Apr-15	1	90%	267	30
2.65%	299	26-Jul-15	1	90%	269	30
2.587%	300	03-Apr-16	1	90%	270	30
3.148%	375	02-Apr-17	0	100%	375	0
		TOTAL:			2,191	10,083

Holdings after transfer:

Producer:	AAA Farms			
Transfer Date:	April-05-17			
Total Quota	8,592			

Allocation Percentage	# Special Allocation Birds Issued	Special Allocation Issued Date	Full Years Vested Interest	Assessment % At Today	Assessed: Return to BCEMB	# Birds Transferable
	7,000	Sep-04		5%	350	6,650
3.00%	210	08-Nov-09	7	30%	63	147
3.46%	249	28-Nov-10	6	40%	100	149
3.25%	242	19-Oct-14	2	80%	194	48
2.70%	208	26-Apr-15	1	90%	187	21
2.65%	210	26-Jul-15	1	90%	189	21
2.587%	210	03-Apr-16	1	90%	189	21
3.148%	262	02-Apr-17	0	100%	262	O
		TOTAL:			1,534	7,058
roducer:	BBB Farms					

Producer:	BBB Farms			
Transfer Date:	April-05-17			
Total Quota	3,682			

Allocation Percentage	# Special Allocation Birds Issued	Special Allocation Issued Date	Full Years Vested Interest	Assessment % At Today	Assessed: Return to BCEMB	# Birds Transferable
	3,000	Sep-04		5%	150	2,850
3.00%	90	08-Nov-09	7	30%	27	63
3.46%	107	28-Nov-10	6	40%	43	64
3.25%	104	19-Oct-14	2	80%	83	21
2.70%	89	26-Apr-15	1	90%	80	9
2.65%	90	26-Jul-15	1	90%	81	9
2.587%	90	03-Apr-16	1	90%	81	9
3.148%	112	02-Apr-17	0	100%	112	0
		TOTAL:		657	3,025	

AAA Farms and BBB Farms are both subject to the same assessments that ABC Farms was prior to the transfer despite the fact that they are now two distinct farms.

3. Whole Farm Transfer

ABC Farms completes a whole farm transfer to 123 Farms. This transfer does not meet any of the exemption criteria and is subject to all assessments.

Holdings before transfer:

Producer:	ABC Farms					
Transfer Date:	April-05-17					
Total Quota	12,274					
Allocation	# Special Allocation	Special Allocation	Full Years	Assessment %	Assessed:	# Birds
Percentage	Birds Issued	Issued Date	Vested Interest	At Today	Return to BCEMB	Transferable
	10,000	Sep-04		5%	500	9,500
3.00%	300	08-Nov-09	7	30%	90	210
3.46%	356	28-Nov-10	6	40%	143	213
3.25%	346	19-Oct-14	2	80%	277	69
2.70%	297	26-Apr-15	1	90%	267	30
2.65%	299	26-Jul-15	1	90%	269	30
2.587%	300	03-Apr-16	1	90%	270	30
3.148%	375	02-Apr-17	0	100%	375	0
		TOTAL:			2,191	10,083

Holdings after	<u>r transfer:</u>					
Producer:	ABC Farms					
Transfer Date:	April-05-17					
Total Quota	12,274					
Allocation	# Special Allocation	Special Allocation	Full Years	Assessment %	Assessed:	# Birds
Percentage	Birds Issued	Issued Date	Vested Interest	At Today	Return to BCEMB	Transferable
	10,000	Sep-04		5%	500	9,500
3.00%	300	08-Nov-09	7	30%	90	210
3.46%	356	28-Nov-10	6	40%	143	
3.25%	346	19-Oct-14	2	80%	277	69
2.70%	297	26-Apr-15	1	90%	267	30
2.65%	299	26-Jul-15	1	90%	269	
2.587%	300	03-Apr-16	1	90%	270	
3.148%	375	02-Apr-17	0	100%	375	0
		T0T4			0.404	40.000
		TOTAL:			2,191	10,083
Producer:	123 Farms					
Transfer Date:	April-05-17					
Total Quota	10,083					
Allocation	# Special Allocation	Special Allocation	Full Years	Assessment %	Assessed:	# Birds
Percentage	Birds Issued	Issued Date	Vested Interest	At Today	Return to BCEMB	Transferable
	10,083	Apr-17		5%	504	9,579
		TOTAL:			504	9,579
		TOTAL.			504	9,379

As a result of the transfer 2,191 quota units were assessed by the Board and the going concern operation that could hold 12,274 hens is now only allowed to keep 10,083 hens, reducing efficiency by 17.9%. 123 Farms purchased 10,083 quota units and it now has a transferrable quota of 9,579 immediately losing 5% of its initial investment.

4. Partial quota transfer, non-exempt

ABC Farms transfers 1,000 quota units to 123 Farms.

Holdings before transfer:

Producer:	ABC Farms					
Transfer Date:	April-05-17					
Total Quota	12,274					
Allocation	# Special Allocation	Special Allocation	Full Years	Assessment %	Assessed:	# Birds
Percentage	Birds Issued	Issued Date	Vested Interest	At Today	Return to BCEMB	Transferable
	10,000	Sep-04		5%	500	9,500
3.00%	300	08-Nov-09	7	30%	90	210
3.46%	356	28-Nov-10	6	40%	143	213
3.25%	346	19-Oct-14	2	80%	277	69
2.70%	297	26-Apr-15	1	90%	267	30
2.65%	299	26-Jul-15	1	90%	269	30
2.587%	300	03-Apr-16	1	90%	270	30
3.148%	375	02-Apr-17	0	100%	375	C
		TOTAL:			2,191	10,083

<u>Transfer Assessment Calculation:</u>

Producer:	ABC Farms			
Exchange Date:	April-05-17			
Total Quota Before Transfe	12,274			
Total Quota Transferred	2,713			
Total Quota Remaining	9,561			

Total Quota Remaining	9,561					
Allocation	# Special Allocation	Special Allocation	Full Years	Assessment %	Assessed:	# Birds
Percentage	Birds Issued	Issued Date	Vested Interest	At Today	Return to BCEMB	Transferable
	439	Sep-04		5%	22	417
3.00%	300	08-Nov-09	7	30%	90	210
3.46%	356	28-Nov-10	6	40%	143	213
3.25%	346	19-Oct-14	2	80%	277	69
2.70%	297	26-Apr-15	1	90%	267	30
2.65%	299	26-Jul-15	1	90%	269	30
2.587%	300	03-Apr-16	1	90%	270	30
3.148%	375	02-Apr-17	0	100%	375	0
		TOTAL:			1,713	1,000

Holdings after transfer:

Producer:	ABC Farms					
Exchange Date:	April-05-17					
	-					
Total Quota After Transfer	9,561					
Allocation	# Special Allocation	Special Allocation	Full Years	Assessment %	Assessed:	# Birds
Percentage	Birds Issued	Issued Date	Vested Interest	At Today	Return to BCEMB	Transferable
	9,561	Sep-04		5%	478	9,083
		TOTAL:			478	9,083
Producer:	123 Farms					_
Exchange Date:	April-05-17					
Total Quota Before Transfer	-					
Total Quota Transferred	1,000					
Allocation	# Special Allocation	Special Allocation	Full Years	Assessment %	Assessed:	# Birds
Percentage	Birds Issued	Issued Date	Vested Interest	At Today	Return to BCEMB	Transferable
	1,000	Apr-17		5%	50	950
		TOTAL:			50	950

In order to sell 1,000 quota units, ABC Farms was assessed 1,713 quota units leaving ABC Farms with a balance of 9,561 units. This represents an assessment representing 173% of the quota sold and 13% of ABC Farms initial quota holdings.

5. Partial Quota Transfer, exempt

ABC Farms transfers 3,000 quota units to the son at 123 Farms to help him enter the industry.

Holdings before transfer:

Producer:	ABC Farms			
Transfer Date:	April-05-17			
Total Quota	12,274			

Allocation Percentage	# Special Allocation Birds Issued	Special Allocation Issued Date	Full Years Vested Interest	Assessment % At Today	Assessed: Return to BCEMB	# Birds Transferable
	10,000	Sep-04		5%	500	9,500
3.00%	300	08-Nov-09	7	30%	90	210
3.46%	356	28-Nov-10	6	40%	143	213
3.25%	346	19-Oct-14	2	80%	277	69
2.70%	297	26-Apr-15	1	90%	267	30
2.65%	299	26-Jul-15	1	90%	269	30
2.587%	300	03-Apr-16	1	90%	270	30
3.148%	375	02-Apr-17	0	100%	375	0
		TOTAL:			2,191	10,083

Holdings after transfer:

Producer:	ABC Farms					
Exchange Date:	April-05-17					
Total Quota Before Transfe	12,274					
Total Quota Transferred	3,000					
Total Quota Remaining	9,274					
Allocation	# Special Allocation	Special Allocation	Full Years	Assessment %	Assessed:	# Birds
Percentage	Birds Issued	Issued Date	Vested Interest	At Today	Return to BCEMB	Transferable
	9,274	Sep-04		5%	464	8,810

Producer:	123 Farms					
Exchange Date:	April-05-17					
Total Quota Before Transfer	-					
Total Quota Transferred	3,000					
Total Quota Remaining						
Allocation	# Special Allocation	Special Allocation	Full Years	Assessment %	Assessed:	# Birds
Percentage	Birds Issued	Issued Date	Vested Interest	At Today	Return to BCEMB	Transferable
	726	Sep-04		5%	36	690
3.00%	300	08-Nov-09	7	30%	90	210
3.46%	356	28-Nov-10	6	40%	143	213
3.25%	346	19-Oct-14	2	80%	277	69
2.70%	297	26-Apr-15	1	90%	267	30
2.65%	299	26-Jul-15	1	90%	269	30
2.587%	300	03-Apr-16	1	90%	270	30
3.148%	375	02-Apr-17	0	100%	375	0
		TOTAL:			1,727	1,273

Due to the Last In First Out requirement, the child (123 Farms) purchases the quota that was most recently allocated to ABC Farms and as the transfer is exempt from assessments, the child (123 Farms) assumes the quota subject to the same ownership percentage as the parent (ABC Farms).

6. Shareholder Restructuring

ABC Farms has decided to restructure and modify the ownership percentage. Initially, Shareholder A had 70% ownership and Shareholder B had 30%. After the restructuring, Shareholder A has 50% ownership and Shareholder B has 50% ownership. This is not exempt and would be subject to assessments as though it was a whole farm transfer.

Before Restructuring:

Producer:	ABC Farms	at 70/30				
Restructure Date	April-05-17					
Total Quota Offered	12,274					
	# Special Allocation	Special Allocation	Full Years	Assessment %	Assessed:	# Birds
Allocation						
Percentage	Birds Issued	Issued Date	Vested Interest	At Today	Return to BCEMB	Transferable
	10,000	Sep-04		5%	500	9,500
3.00%	300	08-Nov-09	7	30%	90	210
3.46%	356	28-Nov-10	6	40%	143	213
3.25%	346	19-Oct-14	2	80%	277	69
2.70%	297	26-Apr-15	1	90%	267	30
2.65%	299	26-Jul-15	1	90%	269	30
2.587%	300	03-Apr-16	1	90%	270	30
3.148%	375	02-Apr-17	0	100%	375	0
		TOTAL:			2,191	10,083

After Restructuring:

Producer:	ABC Farms	at 50/50				
Restructure Date	April-05-17					
Total Quota	10,083					
Allocation	# Special Allocation	Special Allocation	Full Years	Assessment %	Assessed:	# Birds
Percentage	Birds Issued	Issued Date	Vested Interest	At Today	Return to BCEMB	Transferable
	10,083	Apr-17		5%	504	9,579
		TOTAL:			504	9,579

In order for ABC Farms to restructure, or add/remove a shareholder, it would be assessed 2,191 quota units and lose 18% of its quota.

2005 Assessment Directives:

As part of the review process, the BCEMB has evaluated whether the 2005 Specialty Review Policy objectives related to transfer assessment and industry entry are being fulfilled. The qualitative and quantitative analysis has been separated by policy direction.

1. 5% Transfer Assessment

All quota issued prior to 2005 is subject to a 5% Transfer Assessment. At the time of the 2005 Specialty Review, the BCEMB already had a 5% transfer assessment policy in place. It was modified to exclude full farm transfers from the exemption list.

The purpose of this direct assessment is to ensure that quota is available to meet changing market needs and policy objectives. Between 2005 and 2016, the specialty market has grown from 2.5% to 23% of the BC egg industry, representing approximately 700,000 quota units. In that same timeframe, 25,274 units were assessed through the 5% assessment.

People are reluctant to sell quota if they know that 5% will be deducted from the sale..... It also inflates the cost of quota as producers don't want to take the 5% deduction, so they inflate the cost accordingly.

The vast majority of respondents in the consultation process did not identify any qualitative issues with the 5% transfer assessment; those who did, suggested the removal of the 5% assessment along with the 10/10/10 assessment as any assessment will lead to reduced quota sales and higher quota prices.

Quantitatively, the assessment has been unable to provide enough quota units to sustain the New Producer Program or provide an effective amount of production for new and expanding markets.

2. LIFO 10/10/10 Transfer Assessment

All new quota allocated to producers, regardless of class is subject to the Last-In-First-Out 10/10/10 transfer assessment.

- Producers must transfer the most recently issued quota they received from the Board first.
- The first year quota is issued, 100% is retracted should the producer transfer it. In year
 two and for each subsequent year the amount retracted declines by 10% per annum
 until it reaches a minimum assessment of 10% in year 10.
- Producers holding quota subject to this policy must be actively engaged in the farm operation.

The purpose of this policy is to ensure that quota is produced and available to meet changing markets and policy objectives. Since this policy was introduced in 2005, BC's egg producers have seen over 20% growth with seven quota increases representing 565,715 quota units, 394,517 of those quota units have been issued within the last two and a half years.

Quantitatively, the LIFO 10/10/10 Transfer Assessment has provided for 19,867 quota units in the reserve for the policy objectives. This is a total of 45,141 quota units obtained through both the 5% Direct Assessment and the LIFO 10/10/10 Assessment.

As a result of the 2005 Specialty Review, the BCEMB converted 165,000 hen permits to quota for a total of 79,947 quota units (one producer was only able to house 4,947 hens). Since 2005, the BCEMB has held five New Producer Program draws, issuing 25 producers 3,000 quota units for a total of 75,000 quota units. Eleven of those producers were drawn in 2017, it is estimated that three of them will start in 2017, the remaining eight will start in 2018 and 2019. The current transfer assessment policies are unable to sustain the current New Producer Program or provide an effective amount of production for new and expanding markets.

Of the 30 producers who have currently entered the industry through the New Producer Program, six are no longer in production and seven have purchased additional quota. Those who have sold were provided quota through the MRAP program between 2005 and 2008. The majority of those who have purchased quota have entered through the New Producer Program random draw process. This is an excellent indication that the 10/10/10 policy is effective at keeping new producers in the industry for at least 10 years when they have entered by way of incentive quota.

One of the unintended consequences of this policy is the effect on quota available for transfer in periods of growth. As effective as it is at deterring new Entrants from transferring their incentive quota, it is equally effective at deterring current producers from transferring their industry growth issuances.

The LIFO and the 10-10-10 rules have prevented producers to put quota on the market. There are [producers] that would have sold some quota to finance retooling, but because of the claw back have not done so.

If the farmer wants to reduce the size of his farm he gets penalized while his downsizing can enable a new producer to start and a smaller producer to grow.

We assessed this problem both quantitatively and qualitatively. Throughout the consultation process, BCEMB heard many times that LIFO and 10/10/10 are causing producers to hold on to quota because the amount lost to assessments was too great.

The number of producers offering quota on the exchange has remained relatively constant over the last 12 years. In 2016 it appears as though producers were willing to part with their quota however the producers that offered their quota in 2016 did so for the following reasons:

- 1) They were deemed inactive and were required to sell prior to March 31, 2016 or they risked losing all their quota.
- 2) Succession planning issues.
- 3) The changing tax laws provided some incentive to those who were looking to sell.

A second unintended consequence is the inefficiencies that occur when a whole farms is transferred. A producer must place any issued hens into the barn prior to receiving an issuance

so all producers have enough barn space to hold 100% of their quota while complying with all Board orders. In the case of a whole farm transfer that does not meet any of the exemption criteria, the transferee obtains the land and buildings as well as the transferrable portion of the quota. With the current assessment policies and industry growth, the transferee will receive the land and buildings intact, but only about 80% of the quota.

In most cases, the transfers will happen mid-flock cycle so there are enough hens in the barn for 100% of the quota. In this situation, the new owner must purchase enough quota credits for the remainder of the flock to remain in good standing with the orders. In addition, the subsequent flocks will be much less efficient as the barn is at 80% capacity.

My family wants to grow in this industry. How do we do it with LIFO and 10/10/10?

Quota Exchanges are infrequent and significantly oversubscribed. To purchase a farm as a going concern results in the acquisition of a production unit that is 10-20% inefficient, at no fault of the purchaser. That 10-20% quota that is lost to assessments means that immediately after the transfer, I'd be immediately noncompliant with the board because I would have more birds than quota.

A third unintended consequence is the development of two classes of quota for each producer. At the end of the 10 years for each of these issuances, all producers will have their base quota, subject to a 5% transfer assessment and their issued quota, subject to a 10% transfer assessment.

3. Assessment Exemptions

Currently, the transfer assessments are exempt for the following transfers:

- a. Where Layer Quota is transferred, or deemed to have been transferred, to the transferror's spouse, child, or child and the child's spouse.
- b. Where Layer Quota is transferred between Related Corporate Producers (corporate producers where the direct or indirect interests in which are exclusively held by the same person, or by persons who are related as spouse, child, or child and the child's spouse)
- c. Where Layer Quota is transferred between siblings when all layer quota is transferred from one sibling the other or from one Sibling Related Corporate Producer to another, together with the associated Independent Production Unit
- d. Where one or more Producers transfer Layer Quota to a corporate Producer and the direct or indirect interest of each such transferor in the corporate Producer is proportionate to the Layer Quota so transferred by each such transferor
- e. Where two or more Producers enter into an agreement of partnership and the partnership interest of each such Producer is proportionate to the Layer Quota registered in that Producer's name

f. Where the amount of Layer Quota deemed to have been allotted to a Producer having an interest in a partnership remains registered in that Producer's name upon dissolution of the partnership.

Throughout the consultation, the BCEMB heard that there are additional opportunities to further

There is some change from the direct line of parents to children expanding to siblings or nephews/nieces. I've also heard of some wanting to pass down to long term farm managers.

support industry entry in light of industry renewal through succession planning and new farmers entering through a means other than family succession planning. The BC egg industry's exemption list should mimic the BC Milk industry's list which would include nieces, nephews and grandchildren. In addition, we heard that there is also merit in allowing transfers to siblings and long-time farm managers.

Policy Considerations:

The results of the first consultation verified that there are unintended consequences to the LIFO 10/10/10 transfer assessment policy and that this was negatively impacting the industry. LIFO 10/10/10 and the 5% assessment policies have been attributed to an unwillingness for producers to sell and an increase in quota prices. The increase in quota prices is due to both the limited amount of quota available for sale because of the desire of producers to increase the transferrable portion of that quota, and producers wanting to make up the dollar value on the amount of quota that is assessed on transfer.

For each of the policies listed above, the BCEMB looked at a variety of alternatives. In this next section, each of the alternatives will be considered along with the current policy.

1. 5% Transfer Assessment and Alternatives

The BCEMB did not develop any alternatives for producers to consider in regards to the 5% Transfer Assessment for the second consultation. After reviewing the survey responses and communicating options with the other supply managed commodities, the BCEMB considered the following options:

- 1) Maintain the 5% Transfer Assessment.
- 2) Remove the 5% Transfer Assessment and replace it with a 0% Transfer Assessment.
- 3) Remove the 5% Transfer Assessment and replace it with a Reserve Responsive Assessment.

The BCEMB and our stakeholders understand the importance of having some quota available for new entrants and new markets. The quantitative and qualitative analysis has shown that the 5% transfer assessment has not been successful at providing enough quota to support a New Producer Program and will not work as a standalone program and therefore should not be maintained as is.

The second option is to remove the 5% Transfer Assessment policy and replace it with no assessments. While this would be successful at removing a restrictive policy, it would not be conducive to meeting the policy objective of having quota available for the development of specialty markets and providing for new entrants. This policy option, while favorable to some stakeholders should not be considered as it does not meet the policy objectives as outlined earlier in this paper.

The third option is a Reserve Responsive Assessment. This option would encourage the BCEMB to maintain enough quota in the reserve to continue to administer a New Producer Program during periods of no growth. At this time, the BCEMB is recommending that the Board maintain a minimum of five years and a maximum of 10 years of quota to sustain the New Producer Program. At this time, our New Producer Program dictates that the BCEMB start two new producers per year so the BCEMB would maintain between 30,000 and 60,000 quota units in this reserve.

This reserve would be funded through both the 5% Transfer Assessment and a hold back on National Quota Issuances.

• If the reserve is above 30,000 quota units, then there would be no transfer assessments applied.

- If the reserve is less than 30,000 quota units, a 5% transfer assessment would apply to all non-exempt transfers.
- If the reserve is above 30,000 quota units but less than 60,000 quota units, a 10% hold back would apply to all National Quota Increases prior to distribution to producers.
- If the reserve is above 60,000 quota units, no hold back on National Quota Increases would apply.

5% Transfer Assessment and Alternatives	5% Assessment	0% Assessment	Reserve Responsive Assessment
Does this policy accord with legislation, regulations and agreements?	Yes	Yes	Yes
Does this policy meet the intent of the 2005 Transfer Assessment and Industry Related Policy Objectives?			
Quota is intended to be Produced	Yes	Yes	Yes
Quota is transferrable	Yes	Yes	Yes
 Producers are actively engaged and committed to the industry 	Yes	Yes	Yes
 Quota is available to commodity boards to support policy objectives including development of specialty markets and providing for new entrants in the supply management system 	Yes	No	Yes
Is this policy supported by industry (value chain members)?	Yes	Yes	Yes
Does this policy reflect the 2004 Ministry of Agriculture Regulated Marketing Economic Policy?	Yes	No	Yes
Does this policy fulfill sound marketing policy?	Yes	Yes	Yes
Does this policy fulfill the public interest?	Yes	No	Yes
Does this policy reflect joint considerations and outcomes between your boards?	No	No	Yes

In the fall of 2017, the BCEMB will be holding a consultation on the New Producer Program to determine the effectiveness of the program and to determine if changes are required. At that time, the BCEMB will be developing a set of measurable objectives for the program which will be used to determine when a random draw will be held. If the New Producer Program should change after this review, the minimum and maximum numbers will be adjusted according.

While the industry is in support of removing the 5% transfer assessment, there is recognition that there must be quota available to fund new markets and new producers. This third option balances those concepts and ensures that there will be enough quota in the reserve to sustain a New Producer Program during period where there is no growth in the industry.

The concept of a variable rate assessment policy based on a set of criteria which unrelated to the transferring of quota between producers reflects joint considerations between the supply managed commodity boards.

2. LIFO 10/10/10 Transfer Assessment and Alternatives

As a result of the first consultation, the BCEMB developed three alternatives for producers to consider in regards to the LIFO 10/10/10 Transfer Assessment policy for the second consultation. Throughout this consultation, a fourth policy consideration was identified. After reviewing the survey responses and communicating options with the other supply managed commodities, the BCEMB considered the following options:

- 1) Maintain the LIFO 10/10/10 Transfer Assessment Policy as is.
- Remove the LIFO 10/10/10 Transfer Assessment Policy and replace it with a LIFO 10/10/5 Policy.
- 3) Remove the LIFO 10/10/10 Transfer Assessment Policy and replace it with a FIFO (First In First Out) 10/10/5 Policy.
- 4) Remove the LIFO 10/10/10 Transfer Assessment Policy and replace it with a pro-rata 10/10/5 Policy.
- 5) Remove the LIFO 10/10/10 Transfer Assessment Policy and replace it with a 0/95/2 Policy.
- 6) Remove the LIFO 10/10/10 Transfer Assessment Policy and do not replace it.

The BCEMB and our stakeholders understand the importance of having some quota available for new entrants and new markets. The quantitative and qualitative analysis has shown that the LIFO 10/10/10 transfer assessment policy has not been successful at providing enough quota to support a New Producer Program and is reducing the accessibility of quota to prospective, new and current producers by increasing the prices of quota as well as discouraging producers from selling. Because of these considerations, the BCEMB does not recommend options 1 or 2.

Options 2, 3 and 4 all have a final assessment amount of 5% after 10 years so that once the maximum transferability of that quota has been earned by the producer, the BCEMB and our stakeholders felt that it should then be considered base quota and treated as such. This solves the unintended consequence of two classes of quota.

The analysis did show that the LIFO 10/10/10 transfer assessment policy was successful at ensuring that those who were provided with incentive quota or national growth continued to produce that quota and did not sell it. Because of this success, the BCEMB considered moving to FIFO 10/10/5 or a pro-rata 10/10/5 as outlined in options 3 and 4.

FIFO 10/10/5 would increase the transferability of small amounts of quota but it would not reduce the impact of the assessments for those producers who wish to exit the industry. It would also not solve the efficiency issues identified with whole farm transfers. This policy would also be detrimental to new producers. If a New Producer Program winner obtained their quota and purchased quota, then got into financial trouble, that producer would be required to sell the incentive quota first and be assessed. As this would not solve the identified issues and it would create more issues, the BCEMB does not recommend option 3.

Pro-rata 10/10/5 is an interesting concept introduced by a producer at one of the consultation sessions and then again in the second survey. With a pro-rata 10/10/5, if producers were to sell a portion of their quota, they would be selling an equal portion of each of their issuances and their base quota with the appropriate assessments being administered. This would have a

similar result to option 3 which would increase the transferability of small amounts of quota but it would not reduce the impact of the assessments for those producers who wish to exit the industry. Based on our analysis, it would provide for more quota assessed than option 3 but not enough to make a meaningful difference to the New Producer Program reserve.

The fifth option is the 0/95/2 Policy. This option was proposed to shorten the length of time it took for a producer to receive full transferability of growth quota issued by the Board while still providing an incentive to produce the quota that they have received as growth. It stipulates that all issuances must be produced for a minimum of one year to gain 95% ownership. If a producer decides to sell quota, that producer is subject to a 100% assessment on all issuances that have been produced for less than one year and a forfeiture of all future issuances for a period of two years.

With option 5, there will still be a disincentive for producers to exit the industry during periods of growth and there will be the same unintended consequence as the one the industry is currently facing; producers do not want to sell any quota or exit the industry until they have gained maximum transferability of their issuances. The difference between this option and LIFO 10/10/10 is that quota should start transferring again within two years of the most recent quota issuance. With LIFO 10/10/10 quota transfers may remain on hold for up to 10 years. This option does not solve either of the concerns raised by stakeholders regarding the LIFO 10/10/10 policy and is therefore not being recommended.

The sixth option is to remove the LIFO 10/10/10 Transfer Assessment policy and not replace it. This would correct the inefficiency concerns associated with whole farm transfers as well as remove the current disincentives for producers to sell quota thus increasing accessibility for those who wish to purchase. It does raise the initial concern as to why the LIFO 10/10/10 Transfer Assessment policy was introduced in 2005. Currently, the BCEMB has the following requirements for producers prior to receiving a quota issuance:

- 1) Any newly issued quota hens must be placed and at least 19 weeks old.
- 2) The producer must be compliant with all on-farm programs.
- 3) The producer must be actively engaged and in good standing with the Consolidated Orders.

This ensures that each issuance is being produced for at least one year prior to the producer being able to transfer it. If a producer is able to place the hens in their Egg Production Units, they are less likely to transfer the quota.

One of the objectives of the 2005 Review was to ensure that quota is being produced by that person to which the quota was issued. This objective remains important for the New Producer Program or other programs where incentive quota is issued in order expand new markets or ease entry into the industry. Incentive quota issuances should be treated differently from growth issuances.

In the case of growth issuances, producers already have deep roots in the industry, they have either purchased quota, been in the industry since 1967 or have an incentive quota rooting them in place. These producers are all supporting the industry through levies as well as

participation in consultations and producer meetings, and are helping to shape the industry moving forward. Many of these producers, over 75% of them, will be required to change their production type in the next 20 years. This change will require a complete rebuild or major remodel of their current systems. In many cases, these producers will need capital to finance this transition. Being able to sell a small amount of quota on the exchange will help them to make the transition. In addition to providing capital for a remodel that is being requested by retailers, it will also provide for an increased amount of quota on the exchange for those producers who are looking to expand.

LIFO 10/10/10 Transfer Assessment and Alternatives	LIFO, 10/10/10	LIFO 10/10/5	FIFO, 10/10/5	Pro-rated 10/10/10	0/95/2	No Restrictions
Does this policy accord with legislation, regulations and agreements?	Yes	Yes	Yes	Yes	Yes	Yes
Does this policy meet the intent of the 2005 Transfer Assessment and Industry Related Policy Objectives?						
 Quota is intended to be Produced 	Yes	Yes	Yes	Yes	Yes	Yes
 Quota is transferrable 	No	No	Yes	Yes	Yes?	Yes
 Producers are actively engaged and committed to the industry 	Yes	Yes	Yes	Yes	Yes	Yes
 Quota is available to commodity boards to support policy objectives including development of specialty markets and providing for new entrants in the supply management system 	No	No	Yes	Yes	Yes	Yes
Is this policy supported by industry (value chain members)?	No	No	No	Yes	Yes	Yes
Does this policy reflect the 2004 Ministry of Agriculture Regulated Marketing Economic Policy?	Yes	Yes	Yes	Yes	Yes	Yes
Does this policy fulfill sound marketing policy?	No	No	Yes	Yes	Yes	Yes
Does this policy fulfill the public interest?	No	No	Yes	Yes	Yes	Yes
Does this policy reflect joint considerations and outcomes between your boards?	No	No	No	No	No	Yes

3. Incentive Quota

Incentive quota is quota that is issued to either expand a new market or provided to new producers through our New Producer Program to reduce a barrier to industry entry. In this situation, there is a requirement to ensure that the new producer remains in the industry and does not just take the quota and sell it at the first opportunity. What BC Egg heard through the consultation process is that our stakeholders believe there must be an incentive in place to ensure the new producers remain in production. The 10 year requirement in the LIFO 10/10/10 Transfer Assessment policy has been successful in doing this. While BCEMB is recommending that this policy be removed, it must be replaced with an equally effective program. BCEMB is recommending that all incentive quota issuances remain non-transferrable for 10 years. At the

end of the 10 years, it will become base quota and subject to the same policies as all regular quota.

The BCEMB discussed this recommendation with financial institutions as we do not want to impact a new entrant's ability to be successful. The majority of the financial institutions lend based on cash flow, not on quota values so this should have a limited impact.

As current new producers may have received lending based on the LIFO 10/10/10 assessment policy, the BCEMB will grandfather those new producers who have received their quota as of December 31, 2019 with the 10/10/10 policy; however, the LIFO policy will be removed for those producers. At the end of their 10 years, the grandfathered new producers' quota would turn into base quota and be subject to the same policies as regular quota.

4. Quota Transfer Exemptions

In the past, farms were traditionally passed from parent to child. While this is still occurring, there are some instances where the children are not interested in taking over the farm however, a farm manager, who has been an integral part of the operation for years, is interested. BC Egg also heard that good farm managers are difficult to find and that when a producer does find one, they have a hard time holding on to them. Providing an incentive such as shares in the quota after a specified period of time can provide the encouragement for a manager to stay.

The BCEMB recognizes that this may be administratively difficult however there are a few guidelines we have consulted with and obtained support from our stakeholders on:

1) The farm manager must prove his/her long-standing nature by providing T4s for the last seven years showing that the farm he/she is looking to obtain ownership in has been his/her main source of income.

There may be situations where a producer may wish to transfer quota to a sibling, which may or may not be part of the family's overall succession plan. In the past, BCFIRB has recognized that there are some situations where quota may need to transfer to siblings. Currently, this can only happen with a whole farm transfer. There are many situations in the succession planning process where partial amounts of quota may need to be transferred in order to balance things out. As the quota is still remaining within the direct family and therefore meeting the intent of this policy, this type of transfer should also be exempt.

The BCEMB is recommending that the current Quota Transfer Exemptions policy be expanded to be in line with the BC Milk Marketing Board's exemption list with the addition of farm managers.

5. New Producer Program

Currently, the BCEMB has an agreement with BCFIRB to start two new producers per year through our New Producer Program. In January 2016, the BCEMB held a draw that would satisfy this requirement through to 2020. At this time, the BCEMB is contemplating how the effectiveness of the New Producer Program is being measured. Currently, it is being measured

simply by the number of new producers that are started in a year and whether or not it averages out to two new producers per year starting in 2009.

The original intent of the New Producer Program was to reduce what was felt to be a barrier to entry -- access to quota. The issuance of incentive quota to new producers is successful at achieving that goal.

The BCEMB is proposing to use a series of conditions in order to determine if a new producer program draw is required. These conditions are designed to ensure that the egg industry, as a supply managed sector, continues to encourage the family farm. The conditions will allow for some consolidation of the industry while maintaining the current average farm size and number of producers. Some examples of conditions that the BCEMB may use are outlined below.

- Maintain a minimum number of registered producers. While consolidation is slowed in a supply managed system, the number of registered producers has been declining since the inception of supply management in 1967. For the last 20 years it has remained between 130 and 150 producers. Once the new producers drawn in 2017 have started, the BCEMB will have a total of 143 registered producers.
- 2) Maintain the provincial average farm size within a specified range.

The BCEMB has not conducted a full consultation on the New Producer Program. This will be completed in the fall of 2017. The BCEMB recognizes that the New Producer Program will be affected by the quota assessment tools review, as any changes resulting from this review may affect the New Producer Program.

Final Recommendation:

As a result of the stakeholder consultation and policy review, the BCEMB is requesting approval for the following changes:

- Remove the LIFO 10/10/10 Policy on growth issuances and continue with the BCEMB requirement that states producers do not receive their growth issuance until the hens are placed in their barn.
- 2) Remove LIFO 10/10/10 for incentive quotas and replace it with a 10 year 0% transferability policy. After 10 years, the quota becomes base quota and the producer is no longer classified as a new producer.
- 3) Remove the direct 5% Transfer Assessment Policy and replace it with a Reserve Responsive Assessment that takes into account the amount of quota currently held in the reserve and how much is required for the New Producer Program.
- 4) Expand the transfer assessment exemption list to include:
 - a. Child to parent
 - b. Sibling to sibling
 - c. Grandparent to grandchild
 - d. Uncle/Aunt to nieces and nephews
 - e. Long-standing farm managers
- 5) Apply the policy changes on all quota (past, present, future) with no retroactive adjustments.

The draft amendments to the Consolidated Order that reflect these changes can be found in Appendix 5.

The BCEMB is recommending that any changes made apply to all quota holdings, (past, present and future) with no retroactive adjustments. If the changes are only to be effective on future issuances, this will compound the current problem as producers may postpone transferring any quota until 2027 when their last quota issuance affected by the 10/10/10 policy becomes 100% transferrable.

These policy changes meet the objectives of the 2005 specialty review by ensuring that the BCEMB is continuing to maintain an industry reserve whereby quota remains available to reduce barriers to entry and expand new markets. The mechanism by which that reserve is funded may be a bit different; however, reducing the assessments currently faced by producers will increase the amount of quota available for transfer, providing increased access for producers and new entrants to quota.

The current mechanism of using growth issuances to sustain the reserve at a maximum level will ensure that the New Producer Program is adequately funded during periods of industry growth. The maximum amount ensures that the BCEMB does not keep too much quota in the reserve as the production is required to sustain the market.

Those producers who are provided with incentive quota as an introduction to the industry are encouraged in to remain in the industry for a minimum of 10 years and current producers are required to make space in their barns and place the hens for any growth issuances for which they may be eligible. This ensures that the quota is being used by those who received it. In addition, the BCEMB will continue to require that all registered producers must be actively engaged prior to receiving a growth issuance ensuring that they are committed to the industry.

The success of the Consolidated Orders changes can be measured through:

- 1) The number of new producers through the New Producer Program that remain in the industry for greater than 10 years. The goal of the BCEMB is that 100%.
- 2) The number of new producers who purchase additional quota within their first 10 years. The goal of the BCEMB is 25%.

- 3) The number of successful exchanges held in a year. The goal of the BCEMB is to have three successful exchanges each year.
- 4) The amount of quota that is available in the reserve for the New Producer Program. The goal is for this to be maintained for a minimum of five years and a maximum of ten years of New Producer Program quota.

Throughout this document, you will note that our decisions are guided by the SAFETI principles. Even though they may not be explicitly stated, they are inherent in the nature of the analysis.

Next Steps:

BCEMB is currently in the process of engaging stakeholders from outside industry to assess our 2015-2020 Strategic Plan (Appendix 6) to evaluate (1) the objectives set, and (2) determine if new opportunities exist. The strategic plan refresh is expected to be completed in the winter of 2017.

In September 2017, the BCEMB plans to initiate a consultation process to assess the following:

- 1) Quota Allocation
- 2) New Producer Program
- 3) Pilot Quota Exchange

BCEMB plans to follow an evaluation process similar to one conducted in this consultation and estimates that the consultation will take approximately six (6) months.

BCEMB hopes that the results of this Quota Assessment Tools Review will be approved by BCFIRB before Spring 2018. At that time, the three additional consultations listed above and Strategic Plan refresh will be nearing completion, at which time BCEMB plans to put forward to BCFIRB Key Performance Indicators (KPIs) that can be used for benchmarking tools and decision trigger points that will drive policy direction in the future.

Acknowledgements:

The BCEMB would like to thank BCFIRB for their guidance throughout this process; providing our industry stakeholders with the opportunity to participate and provide input that was instrumental to BCEMB's final Quota Assessment Tools submission.

BCEMB looks forward to working with BCFIRB on this and future projects; and would like to thank them for all their hard work creating a robust and thriving agricultural community.

The BCEMB would like to thank all of the stakeholders who took part in this consultation process.

QUOTA ASSESSMENT TOOLS CONSULTATION

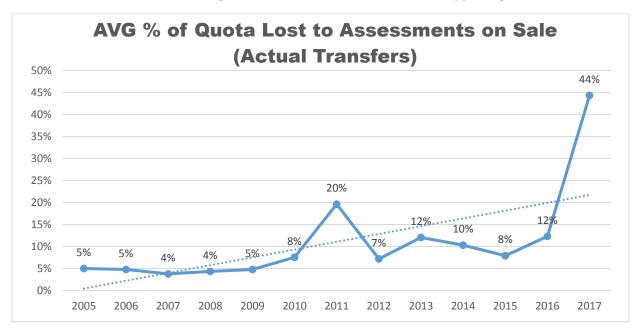
Quota Transfer Summary (2005 to 2017)

BC Egg Marketing Board

2005 – 2017 Transfer Summary

	Α	В		C = 1-(A/(A+B))
Year	Non-Exempt Transfer	Assessments	Exempt Transfer	AVG % of Quota Lost to Assessments on Sale
2005	12,280	646	278	5%
2006	75,452	3,773	15,260	5%
2007	17,095	670	28,934	4%
2008	100,724	4,556	67,894	4%
2009	11,260	563	39,954	5%
2010	39,692	3,234	34,062	8%
2011	11,475	2,802	234,397	20%
2012	46,898	3,634	5,521	7%
2013	22,366	3,064	5,282	12%
2014	22,523	2,587	21,872	10%
2015	14,813	1,273	27,874	8%
2016	130,908	18,339	231,261	12%
2017	3,609	2,874	87,477	44%

The above table is a summary of all transfers (exempt and non-exempt) that have occurred between 2005 and 2017. Details surrounding individual transfers can be found in supporting documents below.



The above graph is an illustration of the effects that growth, combined with LIFO and 10/10/10 have had on transfers that occurred in the past 12 years. From 2005 to 2009 BCEMB had not received an allocation in years and as a result transfers at that time resulted in the producer losing roughly 5% of their overall quota sold. Since 2010, sellers have been subject to assessments that range between 7% and 44% (on average) of their total quota sold.

Page 1/2005 Non-Exempt Quota Transfers
Date #Birds Transf. #Birds after Trans. Type
Date Trsferor/Trsferee Trsferor/Trsferee Trans.#RPs Transfer Date

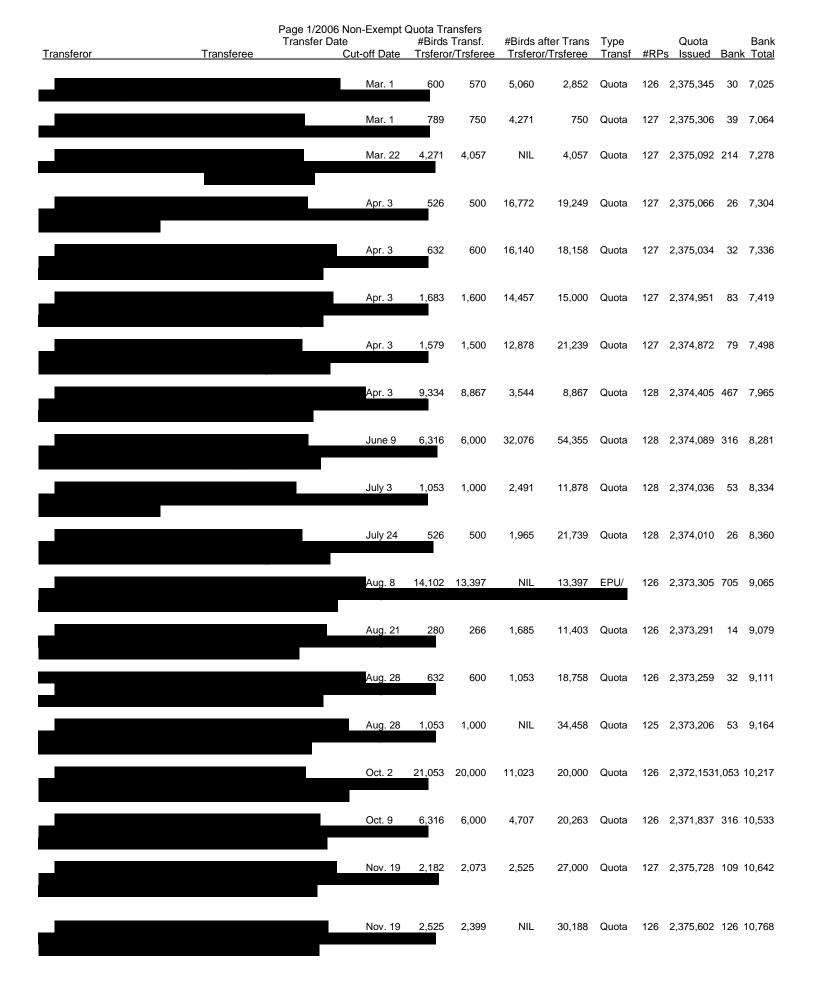
Transferor

Transferee

Cut-off Date

Quota Bank Issued AssmntTotal

Aug. 4 12,926 12,280 NIL 12,280 Shares- 125 2,369,625 646 6,995



		Page 1/20	07 Non-Exe	empt Quota T	ransfers				
Transferor	Transferee	Transfer Date	#Birds T	ransf. #Birds	after Trans. T	ype	Quota	a Bank	
		Cut-off Date	Trsferor/	Trsferee Trs	feror/Trsferee 1	rans.#R	Ps Issue	d Bank Tot	<u>al</u>
PQE									
		Apr. 4	2,105 2,	000 14,020	56,355 Quot	a 128	2,380,097	105 10,638	
		June 6	6,342 6,	025 1,790	39,024 Quo	a 130	2,388,680	317 10.955	
				.,			_,,		
		June 6	1,790 1,	700 NIL	27,811 Quo	a 129	2,388,590	90 11,045	

Page 2/2007

Transferor Transferee Transfer Date #Birds Transf. #Birds after Trans. Type Quota Bank
Cut-off Date Trsferor/Trsferee Trans.#RPs Issued Bank Total



Transferee

Transfer Date #Birds Transf. #Birds after Trans. Type

<u>Cut-off Date Trsferor/Trsferee Trsferor/Trsferee Trans.#RPs</u>

Quota Bank Issued Bank Total

EPU/ Mar. 3 14.737 14.000 NIL 14,000 130 2,404,710 737 12,125 PQE (February 6/08 exchange) Apr. 2 12,481 11,857 4,572 11,857 **PQE** 131 2,404,086 624 12,749 PQE (February 6/08 exchange) Apr. 2 6,466 6,143 11,287 18,000 **PQE** 131 2,403,763 323 13,072 PQE (February 6/08 exchange) Apr. 2 1,895 1,800 9,392 29,065 **PQE** 131 2,403,668 95 13,167 PQE (February 6/08 exchange) 4,633 PQE Apr. 2 4,400 4,759 59,868 131 2,403,435 233 13,400 PQE (October 3/07exchange) 1,579 1,500 18,475 13,780 PQE 131 2,403,356 79 13,479 PQE (April 2/08 exchange) May 7 4,572 4,343 NIL 4,343 PQE 131 2,403,127 229 13,708 PQE (April 2/08 exchange) May 7 285 271 4,474 4,614 **PQE** 131 2,403,113 14 13,722 PQE (April 2/08 exchange) 1,053 85,713 **PQE** 131 2,402,942 171 13,893 May 7 3,421 3,250 PQE (April 2/08 exchange) June 4 1,053 1,000 NIL 12,878 **PQE** 130 2,402,889 53 13,946 EPU/ June 16 14,737 14,000 NIL 14,000 132 2,407,152 737 14,683 PQE 375 356 375 356 PQE Aug. 6 133 2,407,133 19 14,702 **PQE** Aug. 6 375 356 NIL 4,970 **PQE** 132 2,407,114 19 14,721 18,947 18,000 18,000 EPU/ Oct. 31 NIL132 2,406,167 947 15,668 PQE (September 3 Exchange) 2,852 2,709 NIL 20,302 Nov. 5 Quota 131 2,406,024 143 15,811

Page 2/2008

Transferor Transferee Transfer Date #Birds Transf. #Birds after Trans. Type Quota Bank
Cut-off Date Trsferor/Trsferee Trsferor/Trsferee Trans.#RPs Issued Bank Total

Nov. 9 12,316 12,316 NIL 18,475 Shares 131 2,406,024 143 15,811

		2009 N	on-⊨x	empt rrans	sters Page	9 1 01 1			Ty	pe of	Quot	ta
Transferor	Transferee	Dates Transfer Levy	Wk #	#Birds Transferor	ransferred Transferee	#Birds a Transferor	fter Trans. Transferee	Transfer	#Rps	Issued	Bank	Bank Total
		Feb. 4 Feb. 1	6	2,139	2,032	2 4,000	7,002	2 Quota	132	2,405,917	107	7 15,918
		Feb. 4 Feb. 1	6	4,000	3,800) NIL		6 Quota <u>0</u> + lease <i>A</i> 6	131 &M	2,405,717	200	0 16,118
		Apr. 1 Mar. 29	14	1,064	1,011	19,400	1,000	(lease fro		2,405,664 <u>r)</u>	50	3 16,171
		Nov. 4 Nov. 1	45	4,057	3,854	. NIL	5,01° - 40,68°	l Quota			203	

<u>2010 – 2017 Non-Exempt Transfers</u>

			20		
	R WEEK	BUYER	SELLER	TRANSACTION TYPE	
	Week 06	3,420	-	Transfer	Quota Transfer
201	Week 06	-	3,420	Transfer	Quota Transfer
201	Week 06	-	180	Other	Clawback
201	Week 10	8,424	-	Transfer	Quota Transfer
201	Week 10	-	8,424	Transfer	Quota Transfer
201	Week 10	-	709	Other	Clawback
201	Week 12	11,807	-	Transfer	Quota Transfer
203	Week 12	-	11,807	Transfer	Quota Transfer
201	Week 12	-	994	Other	Clawback
201	Week 42	16,041	-	Transfer	Quota Transfer
201	Week 42	-	16,041	Transfer	Quota Transfer
201	Week 42	-	1,351	Other	Clawback
			,	-	
			20	11	
PRODUCER YEA	R WEEK	BUYER		TRANSACTION TYPE	Comment
-	1 Week 10	3,385	-	Transfer	Quota Transfer
_	1 Week 10	-		Transfer	Quota Transfer
•	1 Week 10	-		Other	Clawback
20.	T AACEK TO	-	1,343	Calci	CIUWDUCK
	1 Week 10	3,325	-	Transfer	Quota Transfer
	1 Week 10	3,325		Transfer	Quota Transfer Quota Transfer
					-
20.	1 Week 10	-	296	Other	Clawback
	1 Week 37	4,765	-	Transfer	Quota Transfer
	1 Week 37	-	563	Other	Clawback
201	1 Week 37	-	4,765	Transfer	Quota Transfer
				_	
			20		
	R WEEK	BUYER	SELLER	TRANSACTION TYPE	
_	Week 10	5,986	-	Transfer	Quota Transfer
-	Week 10	-		Transfer	Quota Transfer
	Week 10	-	315	Other	5% Clawback
201	Week 10	-	18	Other	10/10/10 Clawback
_	Week 14	5,985	-	Transfer	Quota Transfer
201	Week 14	-	5,985	Transfer	Quota Transfer
201	Week 14	-	315	Other	5% Clawback
201	Week 14	-	18	Other	10/10/10 Clawback
			_	Transfer	Cald Occata
201	Week 14	17,895		Hunster	Sold Quota
	2 Week 14 2 Week 14	17,895		Transfer	Sold Quota Sold Quota
202			17,895		
202	Week 14	-	17,895	Transfer	Sold Quota
201 201	Week 14	-	17,895	Transfer	Sold Quota
[20] [20] [20]	2 Week 14 2 Week 14	-	17,895 942 -	Transfer Other	Sold Quota 5% Clawback
201 201 201 201 201 201	Week 14 Week 14 Week 14 Week 18 Week 18	4,745	17,895 942 -	Transfer Other Transfer	Sold Quota 5% Clawback Quota Transfer
200 200 200 200 200 200 200	 Week 14 Week 14 Week 14 Week 18 Week 18 Week 18 	4,745	17,895 942 - 4,745	Transfer Other Transfer Other	Sold Quota 5% Clawback Quota Transfer Quota Transfer
200 200 200 200 200 200 200 200	 Week 14 Week 14 Week 18 Week 18 Week 18 Week 18 Week 18 Week 18 	- - 4,745 - -	17,895 942 - 4,745 250 133	Transfer Other Transfer Other Other Other	Sold Quota 5% Clawback Quota Transfer Quota Transfer 5% assessment
200 200 200 200 200 200 200 200	 Week 14 Week 14 Week 14 Week 18 Week 18 Week 18 	4,745	17,895 942 - 4,745 250 133	Transfer Other Transfer Other Other	Sold Quota 5% Clawback Quota Transfer Quota Transfer 5% assessment 3% allocation asses.
200 200 200 200 200 200 200 201	 Week 14 Week 14 Week 18 Week 18 Week 18 Week 18 Week 18 Week 18 	4,745	17,895 942 - 4,745 250 133 143	Transfer Other Transfer Other Other Other Other Other	Sold Quota 5% Clawback Quota Transfer Quota Transfer 5% assessment 3% allocation asses. 3.46% allocation asses.
201 201 201 201 201 201 201 201	 Week 14 Week 14 Week 18 	4,745	17,895 942 - 4,745 250 133 143 4,167	Transfer Other Transfer Other Other Other Other Transfer Other	Sold Quota 5% Clawback Quota Transfer Quota Transfer 5% assessment 3% allocation asses. 3.46% allocation asses. Quota Transfer
201 201 201 201 201 201 201 201 201 201	2 Week 14 2 Week 14 2 Week 18 2 Week 18 2 Week 18 2 Week 18 2 Week 18 2 Week 36 2 Week 36	- - - - - - - -	17,895 942 - 4,745 250 133 143 4,167 263	Transfer Other Transfer Other Other Other Other Transfer Other Other	Sold Quota 5% Clawback Quota Transfer Quota Transfer 5% assessment 3% allocation asses. 3.46% allocation asses. Quota Transfer 5% clawback
201 201 201 201 201 201 201 201 201 201	2 Week 14 2 Week 14 2 Week 18 2 Week 18 2 Week 18 2 Week 18 2 Week 18 2 Week 36 2 Week 36 2 Week 36	- - 4,745 - - - - -	17,895 942 - 4,745 250 133 143 4,167 263 415	Transfer Other	Sold Quota 5% Clawback Quota Transfer Quota Transfer 5% assessment 3% allocation asses. 3.46% allocation asses. Quota Transfer 5% clawback 90% clawback
200 200 200 200 200 200 200 200 200 200	2 Week 14 2 Week 14 2 Week 18 2 Week 18 2 Week 18 2 Week 18 2 Week 18 2 Week 36 2 Week 36 2 Week 36 2 Week 36		17,895 942 - 4,745 250 133 143 4,167 263 415 438	Transfer Other	Sold Quota 5% Clawback Quota Transfer Quota Transfer 5% assessment 3% allocation asses. 3.46% allocation asses. Quota Transfer 5% clawback 90% clawback 80% clawback
200 200 200 200 200 200 200 200 200 200	2 Week 14 2 Week 14 2 Week 18 2 Week 18 2 Week 18 2 Week 18 2 Week 18 2 Week 36 2 Week 36 2 Week 36	- - 4,745 - - - - -	17,895 942 - 4,745 250 133 143 4,167 263 415	Transfer Other	Sold Quota 5% Clawback Quota Transfer Quota Transfer 5% assessment 3% allocation asses. 3.46% allocation asses. Quota Transfer 5% clawback 90% clawback
201 202 203 203 203 203 204 204 204 205 206 206 207 207 207 207 207 207 207 207 207 207	2 Week 14 2 Week 18 2 Week 18 2 Week 18 2 Week 18 2 Week 18 2 Week 18 2 Week 36 2 Week 36 2 Week 36 2 Week 36	- - - - - - - - - - - - - - - - - - -	17,895 942 - 4,745 250 133 143 - 4,167 263 415 438	Transfer Other Other Other Other Other Other Other Other Other Transfer Other Other Other Transfer Other Other	Sold Quota 5% Clawback Quota Transfer Quota Transfer 5% assessment 3% allocation asses. 3.46% allocation asses. Quota Transfer 5% clawback 90% clawback 80% clawback Quota Transfer
200 200 200 200 200 200 200 200 200 200	2 Week 14 2 Week 18 2 Week 36	- - - - - - - - - - - - - - - - - - -	17,895 942 - 4,745 250 133 143 - 4,167 263 415 438 -	Transfer Other Other Other Other Other Other Other Other Transfer Other Transfer Other Transfer Other Transfer	Sold Quota 5% Clawback Quota Transfer Quota Transfer 5% assessment 3% allocation asses. 3.46% allocation asses. Quota Transfer 5% clawback 90% clawback 80% clawback Quota Transfer Quota Transfer
201 202 203 203 203 203 203 204 204 205 206 207 207 207 207 207 207 207 207 207 207	2 Week 14 2 Week 18 2 Week 18 2 Week 18 2 Week 18 2 Week 18 2 Week 18 2 Week 36 2 Week 36 2 Week 36 2 Week 36	- - - - - - - - - - - - - - - - - - -	17,895 942 - 4,745 250 133 143 - 4,167 263 415 438 - - 7,287	Transfer Other Other Other Other Other Other Other Other Other Transfer Other Other Other Transfer Other Other	Sold Quota 5% Clawback Quota Transfer Quota Transfer 5% assessment 3% allocation asses. 3.46% allocation asses. Quota Transfer 5% clawback 90% clawback 80% clawback Quota Transfer

			20	12	
DDODUCED VEAD	WEEK	DLIVED	20		Commont
	WEEK	BUYER	SELLER	TRANSACTION TYPE	
	Week 01	1,900	-	Other	Quota Transfer
	Week 01	-	1,900	Other	Quota Transfer
2013	Week 01	-	100	Other	Quota Sale 5% clawback
2013	Week 06	3,600	-	Transfer	Quota Transfer
2013	Week 06	-	3,600	Transfer	Quota Transfer
2013	Week 06	-	190	Other	Quota Sale 5% Clawback
2013	Week 49	4,866	-	Transfer	Quota Transfer
2013	Week 49	-	4,866	Transfer	Quota Transfer
2013	Week 49	-	250	Other	5% clawback
2013	Week 49	-	105	Other	60% clawback
2013	Week 49	-	107	Other	70% clawback
2013	Week 49	_	12,000	Transfer	Quota Transfer
	Week 49	_	598	Other	5% clawback
	Week 49		514	Other	60% clawback
	Week 49	- 12 000	712	Other	70% clawback
2013	Week 49	12,000	-	Transfer	Quota Transfer
	Week 50	4,000	-	Transfer	Quota Transfer
	Week 50	-	4,000	Transfer	Quota Transfer
2013	Week 50	-	488	Other	5% Clawback
			20	14	
PRODUCER YEAR	WEEK	BUYER	SELLER	TRANSACTION TYPE	Comment
2014	Week 04	-	1,425	Transfer	Quota Transfer
2014	Week 04	-	75	Other	5% Clawback
2014	Week 04	1,425	-	Transfer	Quota Transfer
2014	Week 14	10,796	-	Transfer	Quota Transfer
_	Week 14	-	555	Other	5% clawback
	Week 14	_	237	Other	60% Clawback
-		_		Other	
	Week 14		233		70% clawback
2014	Week 14	-	10,796	Transfer	Quota Transfer
2011	M/a a l: 27	1 500		Tuesefes	Ouete Transfer
	Week 27	1,500	-	Transfer	Quota Transfer
-	Week 27	-	625	Other	5-60-70% Clawbacks
2014	Week 27	-	1,500	Transfer	Quota Transfer
	Week 32	17,892	-	Transfer	Quota Transfer
	Week 32	984	-	Other	5% Clawback Error
2014	Week 32	-	17,892	Transfer	Quota Transfer
2014	Week 40	-	300	Other	5% Clawback
2014	Week 40	-	174	Other	60% Clawback
	Week 40	-	230	Other	70% Clawback
	Week 40	-		Transfer	Quota Transfer
	Week 40	5,802	-	Transfer	Quota Transfer
2014		3,002			
2014	Week 45	-	158	Other	5% Clawback
	Week 45				
		2 000		Transfer	Quota Transfer
2014	Week 45	3,000	-	Transfer	Quota Transfer

			20		
landar variable			20		_
	WEEK	BUYER		TRANSACTION TYPE	
_	Week 19	-	266	Other	5% Assessment
_	Week 19	-	90	Other	60% Clawback
2015	Week 19	-	125	Other	70% Clawback
2015	Week 19	-	173	Other	100% Clawback
2015	Week 19	-	4,847	Transfer	Quota Transfer
2015	Week 19	4,847	-	Transfer	Quota Transfer
2015	Week 30	-	438	Other	5% Clawback
2015	Week 30	-	23	Other	50% Clawback
2015	Week 30	-	66	Other	60% Clawback
-	Week 30	_		Transfer	Quota Transfer
<u> - </u>	Week 30	8,234	-	Transfer	Quota Transfer
2010	cc.x.bc	0,23 :			Quota Hullore
2015	Week 45	_	46	Other	5% Clawback
_	Week 45	-		Transfer	June 2015 Provincial Quota Exchange Transfer
<u>-</u>	Week 45	866	-	Transfer	June 2015 Provincial Quota Exchange Transfer
2015	vveek 45	000		iidiisiei	June 2013 Flovincial Guota excilatise Hallstei
2045	Most 47	900		Transfor	Luna Quata Evchanga Transfer
	Week 47	866	-	Transfer	June Quota Exchange Transfer
_	Week 47	-	46	Other	5% Clawback
2015	Week 47	-	866	Transfer	June Quota Exchange Transfer
			20	16	
PRODUCER YEAR	WEEK	BUYER	SELLER	TRANSACTION TYPE	Comment
2016	Week 15	-	1,330	Other	5% Assessment March Quota Exchange
2016	Week 15	-	793	Other	10/10/10 Assessment March Quota Exchange
2016	Week 15	-	26,226	Transfer	March Quota Exchange
2016	Week 15	3,941	-	Transfer	March Quota Exchange
2016	Week 15	-	28,112	Transfer	March Quota Exchange
2016	Week 15	-	1,420	Other	5% Assessment March Quota Exchange
2016	Week 15	-	2,612	Other	10/10/10 Assessment March Quota Exchange
2016	Week 15	3,941	-	Transfer	March Quota Exchange
	Week 15	-	120	Other	5% Assessment March Exchange
	Week 15	-		Transfer	March Quota Exchange
_	Week 15	1,000	-,-,-	Transfer	March Quota Exchange
_	Week 15	3,941	_	Transfer	March Quota Exchange
	Week 15	1,000		Transfer	-
	Week 15	2,000	-	Transfer	March Quota Exchange
_					March Quota Exchange
_	Week 15	2,500	-	Transfer	March Quota Exchange
-	Week 15	2,100	-	Transfer	March Quota Exchange
_	Week 15	3,941	-	Transfer	March Quota Exchange
_	Week 15	3,941	-	Transfer	March Quota Exchange
	Week 15	3,941	-	Transfer	March Quota Exchange
_	Week 15	3,941	-	Transfer	March Quota Exchange
	Week 15	4,084	-	Transfer	March Quota Exchange
	Week 15	4,084	-	Transfer	March Quota Exchange
	Week 15	4,085	-	Transfer	March Quota Exchange
2016	Week 15	4,085	-	Transfer	March Quota Exchange
2016	Week 15	4,084	-	Transfer	March Quota Exchange
2016	Week 52	-	2,342	Other	Clawback 5% assesment
-	Week 52	-	422	Other	Clawback 3% issuance
	Week 52	-	668	Other	Clawback 3.46% issuance
	Week 52	_		Other	Clawback 3.25% issuance
	Week 52	_	1,253	Other	Clawback 2.7% issuance
	Week 52	-		Other	Clawback 2.65% issuance
	Week 52	-			
				Transfer	Transfer to Producer 2591
2016	Week 52	46,918	-	Transfer	Transfer to Producer 2591

				2016 (0	Cont)	
RODUCER	YEAR	WEEK	BUYER	SELLER	TRANSACTION TYPE	Comment
	2016	Week 53	1,488	-	Transfer	December Quota Exchange
	2016	Week 53	-	121	Other	5% Assessment December Quota Exchange
	2016	Week 53	-	332	Other	10/10/10 Assessment December Quota Exchange
	2016	Week 53	-	2,421	Transfer	December Quota Exchange
	2016	Week 53	-	239	Other	5% Quota Assessment December Quota Exchange
	2016	Week 53	-	277	Other	10/10/10 Assessment December Quota Exchange
	2016	Week 53	-	4,743	Transfer	December Quota Exchange
	2016	Week 53	-	20	Other	5% Assessment December Quota Exchange
	2016	Week 53	-	10	Other	10/10/10 Assessment Dec Quota Exchange
	2016	Week 53	-	380	Transfer	December Quota Exchange
	2016	Week 53	1,488	-	Transfer	December Quota Exchange
	2016	Week 53	1,488	-	Transfer	December Quota Exchange
		Week 53	-	165	Other	5% Quota Assessment December Quota Exchange
		Week 53	-		Other	10/10/10 Quota Assessment December Quota Exchange
		Week 53	-		Transfer	December Quota Exchange
		Week 53	-		Other	5% Quota Assessment December Quota Exchange
		Week 53	_		Other	10/10/10 Assessment December Quota Exchange
		Week 53	_		Transfer	December Quota Exchange
		Week 53	-		Other	9
		Week 53				2.587% Assessment December Quota Exchange
					Other	2.65% Assessment December Quota Exchange
		Week 53	-		Other	2.7% Assessment December Quota Exchange
		Week 53	-		Other	2.7% Assessment December Quota Exchange
		Week 53	-		Other	3.25% Assessment December Quota Exchange
		Week 53	-		Other	3.46% Assessment December Quota Exchange
	2016	Week 53	-		Other	3.00% Assessment December Quota Exchange
	2016	Week 53	-		Other	Assessment December Quota Exchange
	2016	Week 53	-	1,600	Transfer	December Quota Exchange
	2016	Week 53	1,489	-	Transfer	December Quota Exchange
	2016	Week 53	-	250	Other	5% Assessment December Quota Exchange
	2016	Week 53	-	255	Other	10/10/10 Assessment December Quota Exchange
	2016	Week 53	-	4,996	Transfer	December Quota Exchange
	2016	Week 53	1,488	-	Transfer	December Quota Exchange
	2016	Week 53	750	-	Transfer	December Quota Exchange
	2016	Week 53	1,000	-	Transfer	December Quota Exchange
	2016	Week 53	1,488	-	Transfer	December Quota Exchange
	2016	Week 53	1,599	-	Transfer	December Quota Exchange
		Week 53	1,599	-	Transfer	December Quota Exchange
		Week 53	1,600	-	Transfer	December Quota Exchange
		Week 53	1,599	-	Transfer	December Quota Exchange
		Week 53	1,599	-	Transfer	December Quota Exchange
		Week 53	1,599	-	Transfer	December Quota Exchange
		Week 53	-		Other	5% Assessment December Quota Exchange
		Week 53	_		Other	10/10/10 Assessment December Quota Exchange
		Week 53	-		Transfer	December Quota Exchange
		Week 53				December Quota Exchange
			1,599	-	Transfer	. 5
		Week 53	1,599	-	Transfer	December Quota Exchange
		Week 53	1,488	-	Transfer	December Quota Exchange
	2016	Week 53	2,421	-	Transfer	December Quota Exchange
				20:		
DUCER		WEEK	BUYER		TRANSACTION TYPE	
	_	Week 14	-		Other	5% Assessment March Quota Exchange
		Week 14	-	2725	Other	10/10/10 Assessment March Quota Exchange
	2017	Week 14	-	3609	Transfer	April Quota Exchange
	2017	Week 14	2,354	0	Transfer	April Quota Exchange
	2017	Week 14	1,255	0	Transfer	April Quota Exchange

2005 – 2017 Exempt Transfers

					2005	
PRODUCER	YEAR	WEEK	BUYER	SELLER	TRANSACTION TYPE	Comment
	2005	Week 37	-		Transfer	Exempt Transfer
	2005	Week 37	278	-	Transfer	Exempt Transfer
					2006	
PRODUCER	YEAR	WEEK	BUYER	SELLER	TRANSACTION TYPE	Comment
	2006	Week 02	9,600	-	Transfer	Exempt Transfer
	2006	Week 02	-	9,600	Transfer	Exempt Transfer
	2006	Week 02	5,660	-	Transfer	Exempt Transfer
	2006	Week 02	-	5,660	Transfer	Exempt Transfer
					2007	
PRODUCER	YEAR	WEEK	BUYER	SELLER	TRANSACTION TYPE	Comment
	2007	Week 20	2,500	-	Transfer	Exempt Transfer
	2007	Week 20	-	2,500	Transfer	Exempt Transfer
	2007	Week 31	7,002	-	Transfer	Exempt Transfer
	2007	Week 31	-	7,002	Transfer	Exempt Transfer
		Week 42	-	19,432	Transfer	Exempt Transfer
	2007	Week 42	19,432	-	Transfer	Exempt Transfer
					2008	
PRODUCER	_	WEEK	BUYER		TRANSACTION TYPE	Comment
	_	Week 07	-	15,650	Transfer	Exempt Transfer
	2008	Week 07	15,650	-	Transfer	Exempt Transfer
	_	Week 13	-	4,000	Transfer	Exempt Transfer
	2008	Week 13	4,000	-	Transfer	Exempt Transfer
	_	Week 18	9,851	-	Transfer	Exempt Transfer
	2008	Week 18	-	9,851	Transfer	Exempt Transfer
	_	Week 20	2,000	-	Transfer	Exempt Transfer
	2008	Week 20	-	2,000	Transfer	Exempt Transfer
	2000			44 70-		
		Week 23	-	14,737	Transfer	Exempt Transfer
	2008	Week 23	14,737	-	Transfer	Exempt Transfer
	2000	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\		10.047	Tuenefen	Fire sout Transfer
		Week 44	-	-	Transfer	Exempt Transfer
	2008	Week 44	18,947	-	Transfer	Exempt Transfer
	2000	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	2.700		Tueseefes	Fire sout Transfer
	_	Week 45	2,709	2 700	Transfer	Exempt Transfer
	2008	Week 45	-	2,709	Transfer	Exempt Transfer

					2009	
PRODUCER	VEAD	WEEK	BUYER	CELLED	TRANSACTION TYPE	Comment
FRODUCER		Week 21	1,300	JELLIN -	Transfer	Exempt Transfer
	-	Week 21	- 1,500		Transfer	Exempt Transfer
	2003	WEEK ZI	-	1,300	Hallstei	Exempt mansier
	2000	Week 21	800	_	Transfer	Exempt Transfer
	_	Week 21			Transfer	Exempt Transfer
	2003	WEEK ZI		800	Transier	Liveringt transfer
	2009	Week 23	1,100	_	Transfer	Exempt Transfer
	-	Week 23	-		Transfer	Exempt Transfer
	2003	Week 25		1,100	Transier	Exempt transfer
	2009	Week 28	28,548	_	Transfer	Exempt Transfer
	-	Week 28	-	28.548	Transfer	Exempt Transfer
	2003			20,5 .0	a.io.e.	Exempt name:
	2009	Week 39	2,710	-	Transfer	Exempt Transfer
	_	Week 39	-	2,710	Transfer	Exempt Transfer
				,		
	2009	Week 45	-	422	Transfer	Exempt Transfer
	2009	Week 45	422	-	Transfer	Exempt Transfer
						r r · · · ·
	2009	Week 46	-	5,074	Transfer	Exempt Transfer
	2009	Week 46	5,074	-	Transfer	Exempt Transfer
					2010	· ·
PRODUCER	YEAR	WEEK	BUYER	SELLER	TRANSACTION TYPE	Comment
	2010	Week 08	17,951	-	Transfer	Exempt Transfer
	2010	Week 08	-	17,951	Transfer	Exempt Transfer
	2010	Week 22	13,592	-	Transfer	Exempt Transfer
	2010	Week 22	-	13,592	Transfer	Exempt Transfer
	2010	Week 29	3,500	-	Transfer	Exempt Transfer
	2010	Week 29	-	3,500	Transfer	Exempt Transfer
	_					
	_	Week 29	-	3,500	Transfer	Exempt Transfer
	2010	Week 29	3,500	-	Transfer	Exempt Transfer
	_	Week 36	1,500	-	Transfer	Exempt Transfer
	2010	Week 36	-	1,500	Transfer	Exempt Transfer
	2012			2.42=		
	_	Week 36	- 2.425		Transfer	Exempt Transfer
	2010	Week 36	3,135	-	Transfer	Exempt Transfer
	2010	\\\os!: 45		2 200	Transfor	Everant Transfer
	_	Week 45	2 200	2,200	Transfer	Exempt Transfer
	2010	Week 45	2,200	-	Transfer	Exempt Transfer
		144 1 45	2.500		T	5 T
	_	Week 45 Week 45	3,500	2 500	Transfer Transfer	Exempt Transfer Exempt Transfer

PRODUCER						2011	
2011 Week 01	PRODUCER	YEAR	WEEK	BUYER	SELLER		Comment
2011 Week 24 2,255 -							
2011 Week 24 52,554 - Transfer Exempt Transfer				-,	10.863		
2011							2
2011		2011	Week 24	52,554	-	Transfer	Exempt Transfer
2011 Week 24 - 12,718 Transfer Exempt Transfer		2011	Week 24	-	52,554	Transfer	
2011 Week 24 - 12,718 Transfer Exempt Transfer							
2011 Week 24 - 12,718 Transfer Exempt Transfer		2011	Week 24	12,718	-	Transfer	Exempt Transfer
2011 Week 24 - 34,215 Transfer		2011	Week 24	-	12,718	Transfer	
2011 Week 24 - 34,215 Transfer							
2011 Week 24 23,400 - Transfer Exempt Transfer		2011	Week 24	34,215	-	Transfer	Exempt Transfer
2011 Week 24 - 23,400 Transfer Exempt Transfer Exempt Transfer 2011 Week 24 - 35,360 - Transfer Exempt Transfer Exempt Transfer 2011 Week 24 - 35,360 Transfer Exempt Transfer Exempt Transfer 2011 Week 24 - 1,925 Transfer Exempt Transfer Exempt Transfer 2011 Week 24 - 33,730 Transfer Exempt Transfer Exempt Transfer 2011 Week 24 - 33,730 Transfer Exempt Transfer Exempt Transfer 2011 Week 36 - 27,860 Transfer Exempt Transfer Exempt Transfer 2011 Week 36 - 27,860 Transfer Exempt Transfer Exempt Transfer 2011 Week 36 - 27,860 Transfer Exempt Transfer Exempt Transfer 2011 Week 36 - 2012 Week 36 - 833 Other Exempt Transfer 2012 Week 36 - 833 Other Exempt Transfer 2012 Week 36 - 833 Other Exempt Transfer 2012 Week 27 5,071 Transfer Exempt Transfer 2012 Week 27 5,071 Transfer Exempt Transfer 2012 Week 27 5,071 Transfer Exempt Transfer Exempt Transfer 2012 Week 44 450 - Transfer Exempt Transfer Exempt Transfer 2013 Week 50 5,250 Transfer Exempt Transfer Exempt Transfer 2013 Week 50 - 5,250 Transfer Exempt Transfer Exempt Transfer 2013 Week 50 - 5,250 Transfer Exempt Transfer Exempt Transfer Exempt Transfer 2013 Week 50 - 5,250 Transfer Exempt Transfer Ex		2011	Week 24	-	34,215	Transfer	Exempt Transfer
2011 Week 24 - 23,400 Transfer Exempt Transfer Exempt Transfer 2011 Week 24 - 35,360 - Transfer Exempt Transfer Exempt Transfer 2011 Week 24 - 35,360 Transfer Exempt Transfer Exempt Transfer 2011 Week 24 - 1,925 Transfer Exempt Transfer Exempt Transfer 2011 Week 24 - 33,730 Transfer Exempt Transfer Exempt Transfer 2011 Week 24 - 33,730 Transfer Exempt Transfer Exempt Transfer 2011 Week 36 - 27,860 Transfer Exempt Transfer Exempt Transfer 2011 Week 36 - 27,860 Transfer Exempt Transfer Exempt Transfer 2011 Week 36 - 27,860 Transfer Exempt Transfer Exempt Transfer 2011 Week 36 - 2012 Week 36 - 833 Other Exempt Transfer 2012 Week 36 - 833 Other Exempt Transfer 2012 Week 36 - 833 Other Exempt Transfer 2012 Week 27 5,071 Transfer Exempt Transfer 2012 Week 27 5,071 Transfer Exempt Transfer 2012 Week 27 5,071 Transfer Exempt Transfer Exempt Transfer 2012 Week 44 450 - Transfer Exempt Transfer Exempt Transfer 2013 Week 50 5,250 Transfer Exempt Transfer Exempt Transfer 2013 Week 50 - 5,250 Transfer Exempt Transfer Exempt Transfer 2013 Week 50 - 5,250 Transfer Exempt Transfer Exempt Transfer Exempt Transfer 2013 Week 50 - 5,250 Transfer Exempt Transfer Ex							
2011 Week 24 35,360 - Transfer Exempt Transfer Exempt Transfer		2011	Week 24	23,400	-	Transfer	Exempt Transfer
2011 Week 24 - 35,860 Transfer Exempt Transfer		2011	Week 24	-	23,400	Transfer	Exempt Transfer
2011 Week 24 - 35,860 Transfer Exempt Transfer							
2011		2011	Week 24	35,360	-	Transfer	Exempt Transfer
2011 Week 24 - 1,925 Transfer Exempt Transfer		2011	Week 24	-	35,360	Transfer	Exempt Transfer
2011 Week 24 - 1,925 Transfer Exempt Transfer							
2011 Week 24 33,730 - Transfer Exempt Transfer Exemp				1,925			
2011 Week 24		2011	Week 24	-	1,925	Transfer	Exempt Transfer
2011 Week 24							
2011 Week 36 27,860 - Transfer Exempt Transfer		_		33,730	-	Transfer	
2011 Week 51 1,772 - Transfer Exempt Transfer		2011	Week 24	-	33,730	Transfer	Exempt Transfer
2011 Week 51 1,772 - Transfer Exempt Transfer							
2011 Week 51 1,772 - Transfer				27,860			
PRODUCER		2011	Week 36	-	27,860	Transfer	Exempt Transfer
PRODUCER							
PRODUCER				1,772			
PRODUCER		2011	Week 51	-	1,772		Exempt Transfer
2012 Week 36			l				 -
2012 Week 27 - 5,071 Transfer Exempt Transfer	PRODUCER						
2012 Week 27 - 5,071 Transfer Exempt Transfer							
2012 Week 44 450 - Transfer Exempt Transfer		2012	Week 36	833	-	Other	Exempt Transfer
2012 Week 44 450 - Transfer Exempt Transfer		2042	M/ 1: 27		F 074	T	E Turn of
2012 Week 44 450 - Transfer Exempt Transfer		_			5,071		
2012 Week 44 - 450 Transfer Exempt Transfer		2012	week 27	5,0/1	-	Transfer	Exempt Transfer
2012 Week 44 - 450 Transfer Exempt Transfer		2012	\\/ - 44	450		Tuenefen	Fire weat Tues of au
PRODUCER							·
PRODUCER YEAR WEEK BUYER SELLER TRANSACTION TYPE Comment 2013 Week 50 5,250 - Transfer Exempt Transfer 2013 Week 50 - 5,250 Transfer Exempt Transfer 2013 Week 50 - 32 - Transfer Exempt Transfer 2014 Week 50 - 32 - Transfer Exempt Transfer 2014 Week 50 - 32 Transfer Exempt Transfer 2014 WEEK BUYER SELLER TRANSACTION TYPE Comment 2014 Week 02 - 9,571 Transfer Exempt Transfer 2014 Week 02 9,571 - Transfer Exempt Transfer 2014 Week 02 - 2,000 - Transfer Exempt Transfer 2014 Week 02 - 1,500 - Transfer Exempt Transfer 2014 Week 27 - 1,500		2012	Week 44	_	430		Exempt mansier
2013 Week 50 5,250 - Transfer Exempt Transfer	DRODLICER	VEAD	WEEK	DLIVED	CELLED		Comment
2013 Week 50 -	I NODUCEN	_			JLLLER -		
2013 Week 50 32 - Transfer Exempt Transfer				-	5 250		·
2013 Week 50 - 32 Transfer Exempt Transfer		2013	77 CCR 30	·	3,230	unorer	
2013 Week 50 - 32 Transfer Exempt Transfer		2013	Week 5∩	32	_	Transfer	Exempt Transfer
PRODUCER							
PRODUCER YEAR WEEK BUYER SELLER TRANSACTION TYPE Comment Comment 2014 Week 02 - 9,571 Transfer Exempt Transfer 2014 Week 02 9,571 - Transfer Exempt Transfer 2014 Week 02 - 2,000 Transfer Exempt Transfer 2014 Week 02 2,000 - Transfer Exempt Transfer 2014 Week 27 - 1,500 Transfer Exempt Transfer 2014 Week 27 1,500 - Transfer Exempt Transfer 2014 Week 45 - 8,801 Transfer Exempt Transfer			2200		J <u>-</u>		
2014 Week 02 - 9,571 Transfer Exempt Transfer 2014 Week 02 9,571 - Transfer Exempt Transfer 2014 Week 02 - 2,000 Transfer Exempt Transfer 2014 Week 02 2,000 - Transfer Exempt Transfer 2014 Week 27 - 1,500 Transfer Exempt Transfer 2014 Week 27 1,500 - Transfer Exempt Transfer 2014 Week 45 - 8,801 Transfer Exempt Transfer	PRODUCER	YEAR	WEEK	BUYER	SELLER		Comment
2014 Week 02 9,571 - Transfer Exempt Transfer 2014 Week 02 - 2,000 Transfer Exempt Transfer 2014 Week 02 2,000 - Transfer Exempt Transfer 2014 Week 27 - 1,500 Transfer Exempt Transfer 2014 Week 27 1,500 - Transfer Exempt Transfer 2014 Week 45 - 8,801 Transfer Exempt Transfer							
2014 Week 02 - 2,000 Transfer Exempt Transfer 2014 Week 02 2,000 - Transfer Exempt Transfer 2014 Week 27 - 1,500 Transfer Exempt Transfer 2014 Week 27 1,500 - Transfer Exempt Transfer 2014 Week 45 - 8,801 Transfer Exempt Transfer		-		9,571			
2014 Week 02 2,000 - Transfer Exempt Transfer 2014 Week 27 - 1,500 Transfer Exempt Transfer 2014 Week 27 1,500 - Transfer Exempt Transfer 2014 Week 45 - 8,801 Transfer Exempt Transfer				·			
2014 Week 02 2,000 - Transfer Exempt Transfer 2014 Week 27 - 1,500 Transfer Exempt Transfer 2014 Week 27 1,500 - Transfer Exempt Transfer 2014 Week 45 - 8,801 Transfer Exempt Transfer		2014	Week 02	-	2,000	Transfer	Exempt Transfer
2014 Week 27 - 1,500 Transfer Exempt Transfer 2014 Week 27 1,500 - Transfer Exempt Transfer 2014 Week 45 - 8,801 Transfer Exempt Transfer		_		2,000			
2014 Week 27 1,500 - Transfer Exempt Transfer 2014 Week 45 - 8,801 Transfer Exempt Transfer							
2014 Week 27 1,500 - Transfer Exempt Transfer 2014 Week 45 - 8,801 Transfer Exempt Transfer		2014	Week 27	-	1,500	Transfer	Exempt Transfer
		2014	Week 27	1,500			
2014 Week 45 8,801 - Transfer Exempt Transfer		2014	Week 45	-	8,801	Transfer	Exempt Transfer
		2014	Week 45	8,801	-	Transfer	Exempt Transfer

					2015	
PRODUCER	VEAD	WEEK	BUYER	SELLER	TRANSACTION TYPE	Comment
PRODUCER	_	Week 22	DOTEN -	1,250	Transfer	
	_	Week 22				Exempt Transfer
	2013	Week 22	1,250	-	Transfer	Exempt Transfer
	2015	Week 30	1,260	_	Transfer	Exempt Transfer
		Week 30	1,200		Transfer	Exempt Transfer
	2013	WCCK 30		1,200	Transier	Exempt transfer
	2015	Week 30	5,404	_	Transfer	Exempt Transfer
	_	Week 30	-		Transfer	Exempt Transfer
	2025	Treew 50		3,	Transier	Exempt Hallote.
	2015	Week 30	6,044	-	Transfer	Exempt Transfer
	_	Week 30	-	6.044	Transfer	Exempt Transfer
				,		•
	2015	Week 30	8,260	-	Transfer	Exempt Transfer
	2015	Week 30	-	8,260	Transfer	Exempt Transfer
	2015	Week 30	1,003	-	Transfer	Exempt Transfer
	2015	Week 30	-	1,003	Transfer	Exempt Transfer
	2015	Week 37	-	3,000	Transfer	Exempt Transfer
	2015	Week 37	3,000	-	Transfer	Exempt Transfer
	2015	Week 39	1,653	-	Transfer	Exempt Transfer
	2015	Week 39	-	1,653	Transfer	Exempt Transfer
					2016	
PRODUCER	_	WEEK	BUYER	SELLER	TRANSACTION TYPE	Comment
	2016	Week 01	4,667	-	Transfer	Exempt Transfer
	2016	Week 01	-	4,667	Transfer	Exempt Transfer
	2016	Week 03	1,000	-	Transfer	Exempt Transfer
	2016	Week 03	-	1,000	Transfer	Exempt Transfer
	2016	Week 05	-	7,900	Transfer	Exempt Transfer
	2016	Week 05	7,900	-	Transfer	Exempt Transfer
	_	Week 05	-	4,100	Transfer	Exempt Transfer
	2016	Week 05	4,100	-	Transfer	Exempt Transfer
					_	
		Week 05	-	4,300	Transfer	Exempt Transfer
	2016	Week 05	4,300	-	Transfer	Exempt Transfer
	2016	111 1 10		64.400	- ·	
	_	Week 19	-		Transfer	Exempt Transfer
		Week 19	-		Transfer	Exempt Transfer
	_	Week 19	- 61 190		Transfer	Exempt Transfer
	_	Week 19 Week 19	61,180	-	Transfer	Exempt Transfer
	_	Week 19	17,783	-	Transfer Transfer	Exempt Transfer
	2016	vveek 19	37,242	-	ii alisiel	Exempt Transfer
	2016	Week 29	_	1 026	Transfer	Exempt Transfer
	_	Week 29	1,026	1,020	Transfer	Exempt Transfer
	2010	VVCCK 29	1,020	_	Hallstel	Exempt Hansier
	2016	Week 29	800	_	Transfer	Exempt Transfer
	_	Week 29	-		Transfer	Exempt Transfer
	2010	**CGR 23		300	Halloici	Exempt Hundler
	2016	Week 30	16,806	_	Transfer	Exempt Transfer
	_	Week 30	12,951	_	Transfer	Exempt Transfer
	_	Week 30	-		Transfer	Exempt Transfer
	_	Week 30	-		Transfer	Exempt Transfer
		, , , , , ,		_,,552		
	2016	Week 33	2,000	-	Transfer	Exempt Transfer
		Week 33	-		Transfer	Exempt Transfer
	_510			_,500		- P

					2016 (Camb.)	
DDODUCED	VEAD	MEEK	DLIVED	CELLED	2016 (Cont)	Command
PRODUCER		WEEK	BUYER		TRANSACTION TYPE	
	-	Week 35	7 200		Transfer	Exempt Transfer
	2016	Week 35	7,398	-	Transfer	Exempt Transfer
	2016	Week 35	-	4.000	Transfer	Exempt Transfer
		Week 35	4,000	4,000	Transfer	Exempt Transfer
	2010	Week 33	4,000	-	ITalistei	Exempt mansier
	2016	Week 48	-	3 000	Transfer	Exempt Transfer
		Week 48	3,000	-	Transfer	Exempt Transfer
	2010	WCCK 40	3,000		Transier	Exempt Hunster
	2016	Week 48	_	4 200	Transfer	Exempt Transfer
		Week 48	4,200	-,200	Transfer	Exempt Transfer
	2010	WCCK 40	7,200		Transier	Exempt Hunster
	2016	Week 50	_	4 995	Transfer	Exempt Transfer
		Week 50	-		Transfer	Exempt Transfer
	_	Week 50	_		Transfer	Exempt Transfer
	_	Week 50	_		Transfer	Exempt Transfer
		Week 50	_		Transfer	Exempt Transfer
	_	Week 50	_		Transfer	Exempt Transfer
		Week 50	_		Transfer	Exempt Transfer
		Week 50	4,995	-	Transfer	Exempt Transfer
		Week 50	150	_	Transfer	Exempt Transfer
	_	Week 50	178	_	Transfer	Exempt Transfer
	-	Week 50	173	-	Transfer	Exempt Transfer
	-	Week 50	148	_	Transfer	Exempt Transfer
	-	Week 50	150	_	Transfer	Exempt Transfer
	-	Week 50	150	-	Transfer	Exempt Transfer
	2016	Week 52	-	11,754	Transfer	Exempt Transfer
	2016	Week 52	11,754	-	Transfer	Exempt Transfer
						-
	2016	Week 52	-	11,753	Transfer	Exempt Transfer
	2016	Week 52	11,753	-	Transfer	Exempt Transfer
	2016	Week 52	-	11,457	Transfer	Exempt Transfer
	2016	Week 52	11,457	-	Transfer	Exempt Transfer
					2017	·
PRODUCER	YEAR	WEEK	BUYER	SELLER	TRANSACTION TYPE	Comment
	2017	Week 10	-	9000	Transfer	Exempt Transfer
	2017	Week 10	9,000	0	Transfer	Exempt Transfer
	2017	Week 16	-	3473	Transfer	Exempt Transfer
	2017	Week 16	3,473	0	Transfer	Exempt Transfer
	2017	Week 16	-	35000	Transfer	Exempt Transfer
		Week 16	35,000		Transfer	Exempt Transfer
	2017	Week 16	3,864	0	Transfer	Exempt Transfer
	2017	Week 16	-	3864	Transfer	Exempt Transfer
	2017	Week 16	-	35000	Transfer	Exempt Transfer
	2017	Week 16	35,000	0	Transfer	Exempt Transfer
		Week 20	1,110	0	Transfer	Exempt Transfer
	2017	Week 20	-	1110	Transfer	Exempt Transfer

QUOTA ASSESSMENT TOOLS CONSULTATION

Stakeholder Consultation Summary

BC Egg Marketing Board

Consultation Synopsis:

The purpose of the consultation was to gather qualitative data to determine if industry and public interest policy outcomes are being achieved to their fullest potential post BC FIRB's 2005 specialty review.

Consultation Process Summary

Before any recommendations could be made, BCEMB wanted to ensure that each policy directive under review was given its appropriate consideration. Our goal at the outset of this consultation was to create a cohesive policy recommendation that is beneficial to all stakeholders while adhering to the spirit of BCFIRB's 2005 Specialty Review.

Our consultation involved the following:

- 6 in-person meetings with supply managed boards, individually or as a group
- 5 in-person meetings with BCFIRB staff or chair
- 2 in-person producer stakeholder consultations in the following regions:
 - Interior (Salmon Arm)
 - Lower Mainland (Abbotsford)
 - Vancouver Island (Duncan)
- 1 in-person grader and processor meeting
- in-person, individual meetings with four of six financial institutions
- One teleconference meeting with a financial institution
- Review with legal
- 2 surveys e-mailed to producers and other stakeholders as well as posted on the public website

Here is our timeline:

CONSULTATION TIMELINE												
		Ap	oril			May			June			
	Week 1	Week 2	Week 3	Week 4	Week 1	Week 2	Week 3	Week 4	Week 1	Week 2	Week 3	Week 4
Developed Public Website												
Invite BCFIRB to Dropbox												
Producer Consultation #1												
Meeting with Graders/Processor												
Survey Producers												
Analyse Results												
Producer Consultation #2												
Survey Producers												
Analyse Results												
Discuss Impact with Banks												
Create Reccomendation Doc.												
Legal Counsel Review												
Final Submission to BC FIRB												
On-going Meetings												
Meeting with SM partners												
Meeting with FIRB												

Developed Public Website

Our Board is working hard at improving our transparency and efforts to engage the public..

The public is our most important stakeholder but also the most difficult one to reach. Within the first week of this consultation we developed a website that provided the public with information relevant to our consultation. We regularly updated the site throughout the consultation process. A link to our public website can be found here. We also provided a link to the consultation on the front page of our website which can be seen in the picture below:



BCFIRB provided a link the quota assessment tools on their website as well. To the best of BCEMB's knowledge, no members of the public provided any feedback regarding the consultation process or submission at any point throughout our consultation. It is the opinion of BCEMB staff that this is understandable; LIFO and 10/10/10 are complicated for our most seasoned stakeholders; and both BCFIRBs consultation #1 questions, and BCEMB consultation #2 questions, most likely were confusing to outside parties.

Consultation Part #1 Summary

The average producer's familiarity with assessments is similar to the average citizen's familiarity with taxes. There is wide-spread knowledge that they exist but there are few people who have mastered the fundamental concepts that govern their administration and distribution.

The purpose of the first consultation was to take a scientific look, with our stakeholders, at the scope of BCFIRB's 2005 speciality review, its outcome and the quota assessment review that BC Egg was invited to partake in by BCFIRB. A full copy of the PowerPoint presentation from the first consultation can be found in Appendix 3a. Next, a survey was distributed shortly after the in-person consultation sessions.

BCFIRB provided a variety of questions that supply managed boards could choose from. BCEMB staff selected questions they felt would best elicit responses that depicted the respondent's opinion of "the state of the industry" specifically relevant to the scope of this review. The 11 questions below were presented to stakeholders:

- 1. Have transfer assessments limited the transfer of quota, if so, to what extent?
- 2. Do you think limited transfer assessments are contributing to increases in the price of quota?
- 3. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?
- 4. Are there changes to quota transfer assessments or other tools -- that could further reduce barriers to entry and increase quota availability?
- 5. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?
- 6. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?
- 7. Are whole farm transfers still important for succession or industry health?
- 8. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?
- 9. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?
- 10. How have quota assessment tools affected you? Tell us your story.
- 11. What, if anything, would you like to change?

BCEMB's objective was to listen to stakeholders and their feedback and then derive policy proposals based on the feedback received that best represented the opinion of the collective while adhering to the spirit of 2005 Speciality Review.

In total, during the three week period that the survey was open, BCEMB staff received 45 (of a possible 180) responses to our initial survey.

Consultation #1 Analysis

This consultation, along with our second consultation (discussed later), was analyzed from three different lenses:

- Level 1: Summary of All Respondents;
- Level 2: Cross Tabulation of Survey Reponses Based on:
 - a. Geographical Region
 - i. Lower Mainland
 - ii. Interior
 - iii. Vancouver Island
 - b. Percentage Quota Holdings in Industry
 - i. Top 25% (27,479 quota holdings or more)
 - ii. Middle 50% (5,951 to 27,478 quota holdings)

- iii. Bottom 25% (5,950 quota holdings or less)
- Level 3: Individual Responses

All three levels of analysis collected from consultation #1 can be found in Appendix 3b, 3c and 3d.

Below are answers selected by staff from the individual responses that best represents the opinion of the collective whole:

1. Have transfer assessments limited the transfer of quota, if so, to what extent?

I believe they have, LIFO, 10/10/10 assessments have potentially significant financial impacts should a producer want to sell quota. Producers wishing to reduce such penalties would have held back selling quota. To what extent, I can't say, but the financial disincentive is strong, especially in recent years due to the quota increases we have had, so the potential backlog of quota that would have sold could be quite significant.

2. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes, low supply/high demand = higher price

3. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

Yes, assessments restrict the movement of quota sales for all categories. New entrants cannot sell their new entrant quota, they have to run two classes of quota. If they were to purchase, they have the inability to transfer among family. They also struggle with purchasing large amounts of quota based on cash flow, and small lots of quota don't come up for sale because its not equitable for mainstream producers to sell small amounts and take an assessment. Mainstream producers who want to buy whole farms may see upwards of 15% less quota on that farm as a result of the sellers assessment and 10/10/10 LIFO circumstance. This makes whole farm purchases inefficient and less desirable.

4. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

A variety of responses were received – See Appendix 3b

5. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Many are purchasing quota on the revised exchange program. Also, farm succession planning is bringing many new producers into the industry.

6. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

I started farming for my kids. Farms and family go hand in hand. We should encourage not hinder family succession. No family direct family member should be penalized for taking over the family farm. This is the backbone for farming

7. Are whole farm transfers still important for succession or industry health?

Yes to both succession and industry health. Otherwise farmers would try and stay on until their barns and equipment is worn out or obsolete. Whole farm transfers lets new farmers take over with immediate cash flow and they're more likely to modernize facilities than would older farmers waiting to exit.

8. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Yes, non-family succession structures are important as it gives flexibility in succession planning and hopefully allows smaller farms to continue as independent production units, as opposed to the production ending up at larger farms.

9. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

A variety of responses were received – See Appendix 3b

10. How have quota assessment tools affected you? Tell us your story.

A variety of responses were received – See Appendix 3b

11. What, if anything, would you like to change?

A variety of responses were received – See Appendix 3b

Conclusion from First In-Person Consultation:

Rapid and sustained growth in conjunction with LIFO and 10/10/10 has provided a substantial financial disincentive for producers who are on the fence about selling all or part of their quota.

As a consequence, there is an exaggerated disparity between the quota available and the quota sought for purchase; this scarcity is causing increases to the value of quota which in turn is compounding our industry's challenge by adding additional barriers to the accessibility of quota to interested farmers.

Second Producer In-Person Consultation Summary:

The second consultation leveraged the feedback accumulated from our first in-person consultation and survey responses which were received from respondents.

A copy of the presentation that was given to producers can be found in Appendix 4a. The consultation focused on the mathematical implications of LIFO 10/10/10 and the scenarios that trigger assessments. Every potential change proposed was discussed in detail so that producers in attendance were able to see the implications, ask questions, and form conclusions on their preferred option.

Before the second survey was sent, BCEMB contracted Julie Winram of Sentis to polish our survey question and ensure they were worded in the most clear and concise manner in an effort to maximize the number of responses that we received from our stakeholders. A simpler survey in conjunction with encouragement from committees, the Board of Directors, and BCEMB staff saw the total number of responses on the second survey nearly double with 83 responses received of a possible 180.

Consultation #2 Analysis

The following data contains summaries of the questions asked and answers received from our second producer consultation.

Similar to the previous consultation, the information gathered from the survey was analyzed from three different perspectives. The full details from analysis level 1, 2, and 3 can be found in Appendix 4b, 4c, and 4d.

The following information is an analysis that combines both the collective industry response (level 1 analysis) and the segmented responses. It is the opinion of staff that there are no material differences between these two analyses N_0

1. Do you think LIFO (Last In First Out) should be removed?						
	YES	NO	N/A			
LM - Top 25%	10	3	2			
LM – Middle 50%	20	6	2			
LM – Bottom 25%	8	2	6			
INT - Top 25%	1	0	1			
INT – Middle 50%	2	0	0			
INT – Bottom 25%	4	2	1			
VI – Top 25%	0	0	0			
VI – Middle 50%	2	1	0			
VI – Bottom 25%	2	0	0			
Unknown	5	1	2			
Total	54	15	14			

No 22% Yes 78%

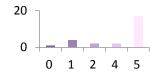
In survey format, each policy objective needed to be individually evaluated to determine the appetite for change from the producer population. Respondents from all quota holdings were roughly 4:1 in favor of removing LIFO; for example in the LM:

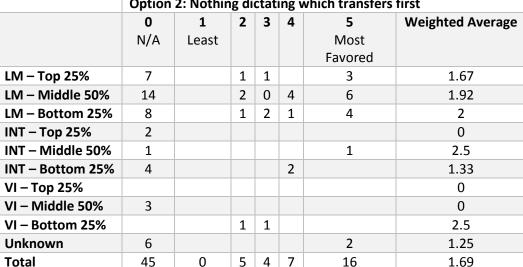
•	Top 25% quota holders	10:3	77%
•	Middle 25% quota holders	20:6	77%
•	Bottom 25% guota holders	8:2	80%

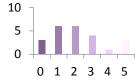
The evidence is clear, producers are overwhelmingly in favor of removing LIFO.

2.	Here are options that meet the SAFETI principles with which we could replace LIFO.
	Please rank them in order of preference (5 being most favored approach)

	Option	Option 1: FIFO (FIRST IN FIRST OUT)								
	0	1	2	3	4	5	Weighted Average			
	N/A	Least				Most				
						Favored				
LM – Top 25%	8	1	1			2	1.08			
LM – Middle 50%	16		1	2	4	3	1.50			
LM – Bottom 25%	10			1	2	3	1.63			
INT – Top 25%	2						0			
INT – Middle 50%			1			1	3.5			
INT – Bottom 25%	2	1				3	2.67			
VI – Top 25%							0			
VI – Middle 50%	1					2	3.33			
VI – Bottom 25%					2		4			
Unknown	5					3	1.88			
Total	44	2	3	3	8	17	1.74			
	Option 2: Nothing dictating which transfers first									







If LIFO is removed, what replaces it? Our producers who answered yes to question 1 were then asked which options they favoured:

- Option 1: First In First Out (FIFO), and
- Option 2: Nothing dictating which transfers first

Producers were asked to score their options on a scale of 1 to 5, with 5 being their most favored and 1 being their least favored. The scores were than given a weighted average based on the total respondents. The weighted average is slightly undervalued because non-responses were given an assumed score of 0 by staff. However, what the scores do show is that while there is consensus that LIFO should be removed, there is no consensus as to what replaces it as producers are split relatively equally.

3. Please tell us if the	ere is another option to the previous question
LM – Top 25%	 Don't know Back in the day just man to man dealings on quota dealings worked real well I thought. If you didn't get involved u missed out A simplified version with no strings attached. Quota can flow to who wants it, and if the market shrinks, it gets taken back.
LM – Middle 50%	 None Let the free increase's be the last to be sold I prefer FIFO
LM – Bottom 25%	 There should be no FIFO or LIFO. FIRB should put a fair assessment policy in place that would apply to all supply managed commodity groups.
INT – Top 25%	
INT – Middle 50%	
INT – Bottom 25%	- A PRORATED LAST IN FIRST OUT
VI – Top 25%	
VI – Middle 50%	NoneWould prefer FIFO
VI – Bottom 25%	- I like the 50/2/5
Unknown	

4. Do you think 10/	10/10 should removed?			
	YES	NO	N/A	
LM – Top 25%	8	2	2	
LM – Middle 50%	15	6	5	
LM – Bottom 25%	6	3	7	No
INT - Top 25%	0	1	1	27%
INT – Middle 50%	1	1	0	
INT – Bottom 25%	5	1	0	Yes
VI – Top 25%	0	0	0	73%
VI – Middle 50%	2	1	0	
VI – Bottom 25%	2	0	0	
Unknown	4	1	9	
Total	43	16	24	

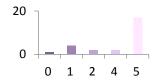
Similar to question 1, this is the second part of the current policy that is under review from this consultation. Seventy-three percent of our producers are in favor of the removal of 10/10/10.

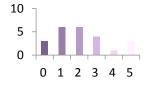
•	Top 25% quota holders	8:2	80%
•	Middle 25% quota holders	15:6	71%
•	Bottom 25% quota holders	6:3	67%

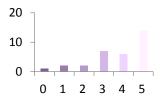
The evidence is clear, producers are overwhelmingly in favor of removing 10/10/10.

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach).

	Option 1: No Conditions						
	0	1	2	3	4	5	Weighted
	N/A	Least				Most Favored	Average
LM – Top 25%	7		1			4	1.83
LM – Middle 50%	18	2			1	5	1.19
LM – Bottom 25%	12	1				3	1
INT - Top 25%	2						0
INT – Middle 50%	1	1					0.5
INT – Bottom 25%	2	1			1	2	2.5
2VI – Top 25%			1				2
VI – Middle 50%	3						0
VI – Bottom 25%						2	5
Unknown	7					1	.63
Total	52	5	2	0	2	17	1.31
	Option 2	: Replace v	vith 1	10/10)/5		
	0	1	2	3	4	5	Weighted
	N/A	Least				Most Favored	Average
LM – Top 25%	8		2	1		1	1
LM – Middle 50%	18	2	3	2	1		0.69
LM – Bottom 25%	12	3				1	0.5
INT – Top 25%	2						0
INT – Middle 50%	2						0
INT – Bottom 25%	4		1			1	1.17
VI – Top 25%							0
VI – Middle 50%	3						0
VI – Bottom 25%	1			1			1.5
Unknown	8						0
Total	58	5	6	4	1	3	0.62
	Option 3	: Replace v	vith ()/95/	/2		
	0	1	2	3	4	5	Weighted
	N/A	Least				Most Favored	Average
LM – Top 25%	9		1		1	1	0.92
LM – Middle 50%	14	1	1	5	2	3	1.58
LM – Bottom 25%	10	1		2	1	2	1.31
INT – Top 25%	2						0
INT – Middle 50%	1					1	2.5
INT – Bottom 25%	3					3	2.5
VI – Top 25%							0
VI – Middle 50%	2					1	1.67
VI – Bottom 25%					2		4
Unknown	5					3	1.88
Total	46	2	2	7	6	14	1.57







If 10/10/10 is removed, what replaces it? Our producers who answered yes to question 5 were then asked which options they favoured:

• Option 1: No Conditions

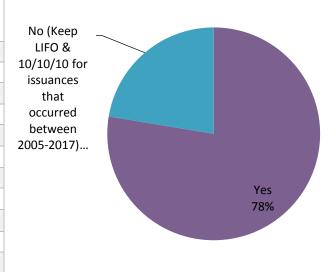
• Option 2: Replace with 10/10/5

• Option 3: Replace with 0/95/2

Respondents are not in favor of the 10/10/5 (a minor alteration of the 10/10/10). There is a large degree of support from the responses received for both the 0/95/2 and no conditions. More support for no conditions is seen in question #6 below.

6. Please tell us if there is an	other option to the previous question
LM – Top 25%	NoNo conditionsPro Rata
LM – Middle 50%	 New producers 10 yrs, for producers over 20 years no conditions Allow exceptions to 10/10/10 for succession farming and scenarios the support newer smaller operations. Stop giving grants to large farms. Simpler the better. You could look at a one sale of quota not more than 25% which would only have the claw back of 5% to 10 %. With that you could only do that 1 time per every 15 years, or something along that line. If they would sell anymore or before the 15 years then they would pay the claw back penalty.
LM – Bottom 25%	- Please see answer to question 4
INT – Top 25%	
INT – Middle 50%	
INT – Bottom 25%	- PRORATED CLAWBACK 10/10
VI – Top 25%	
VI – Middle 50%	
VI – Bottom 25%	 I do like option 3, however it doesn't work in a year where there are no increases, and it certainly doesn't work if there are clawbacks. I believe no conditions with the board always retaining 5% is the best way to go.
Unknown	

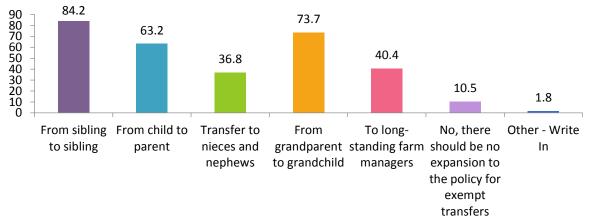
7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?							
YES NO N/A							
LM – Top 25%	7	3	2				
LM – Middle 50%	16	5	5				
LM – Bottom 25%	8	1	7				
INT – Top 25%			2				
INT – Middle 50%	2						
INT – Bottom 25%	4	2					
VI – Top 25%							
VI – Middle 50%	2	1					
VI – Bottom 25%	2						
Unknown	4	1	9				



Do we need to make any changes to LIFO and 10/10/10 applicable to all quota held? Respondents are almost 4:1 in favor of making any changes applicable to all quota held.

Through discussions at the consultations, it was unanimously agreed at every meeting in all three regions that if there are approved changes to LIFO and 10/10/10 that do not include past issuances there will be no increase in the liquidity of quota for another 10 years. There would actually be LESS liquidity in the industry as producers on the fence will wait to sell until they own their quota.

8. Should the p following?	olicy arour	nd exem _l	ot transfers b	e expanded to i	nclude any of t	he
	sibling to sibling	child to parent	nieces and nephews	grandparent to grandchild	long-standing farm managers	No Expansion to Policy
LM - Top 25%	10	6	4	10	4	
LM – Middle 50%	17	14	7	14	8	2
LM – Bottom 25%	5	4	3	6	2	2
INT – Top 25%						
INT – Middle 50%	2	2	1	1	1	
INT – Bottom 25%	6	5	2	6	4	
VI – Top 25%						
VI – Middle 50%	2	2	1	2	2	1
VI – Bottom 25%	2	2	2	2	1	
Unknown	4	1	1	1	1	1
Total	48	36	21	42	23	6



Should expansions be made to the transfer exemptions? Of the respondents that answered this question:

- 84.2% were in favor of adding sibling to sibling transfers
- 63.2% were in favor of adding child to parent transfers
- 36.8% were in favor of adding nieces and nephews
- 73.7% were in favor of adding grandparent to grandchild
- 40.4% were in favor of adding long-standing farm manager
- 10.5% were not in favor of expanding the exempt transfer policy

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?				
	10+ Years FT	15+ Years		
	Manager	Manager	FT Manager	
LM – Top 25%	2	5		
LM – Middle 50%	1	5	2	
LM – Bottom 25%		2		
INT – Top 25%				
INT – Middle 50%				

1

2

1

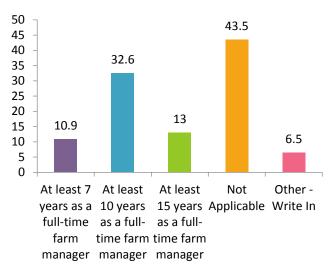
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INT - Bottom 25%

VI – Bottom 25%

VI – Top 25% VI – Middle 50%

Unknown



10. Please tell us if	there is another option to the previous question
LM – Top 25%	
LM – Middle 50%	 Farm Managers is a tricky one. It could fall under a flat rate claw back to a min % ownership. Should this also include land holdings?
LM – Bottom 25%	
INT – Top 25%	
INT – Middle 50%	
INT – Bottom 25%	
VI – Top 25%	
VI – Middle 50%	
VI – Bottom 25%	 5 years Farm manager has shown commitment to the industry and must operate under the same rules as NPP holders, so cannot transfer quota for 10yrs. Actually, that really should be the same for all transfers without assessments
Unknown	

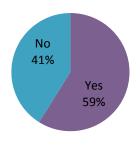
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1

Of those who were in favor of adding long-standing farm manager as an exempt transfer, the majority of the respondents defined "long-standing" as 10+ years.

11. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes? If Yes, Survey complete
If No, Continue to Next Question

	YES	NO	N/A
LM – Top 25%	5	5	2
LM – Middle 50%	13	8	5
LM – Bottom 25%	7	2	7
INT - Top 25%			
INT – Middle 50%	2		
INT – Bottom 25%	3	2	
VI – Top 25%			
VI – Middle 50%	1	2	
VI – Bottom 25%	1	1	
Unknown	1	3	



If our consultation resulted in a change to LIFO 10/10/10, should new entrants via the NPP draw be subject to the same rule changes?

- 59% of the respondents felt that they should
- 41% of the respondents felt that they should not

Those who answered yes to this question were now complete the survey, while those who answered no proceeded to question 12.

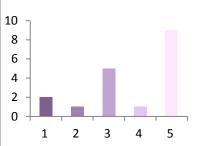
12.	. Here are options that meet the SAFETI principles with which we could replace
	LIFO.
	Discount the sector and a set of sector as the between the forest discount to the sector and the

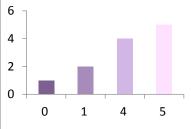
The state of the s					
	Option 1: FIFO (FIRST IN FIRST OUT)				
	1	2	3	4	5
	Least				Most Favored
LM – Top 25%		1	1		2
LM – Middle 50%			3	1	1
LM – Bottom 25%	1		1		
INT - Top 25%					
INT – Middle 50%					
INT – Bottom 25%	1				1
VI – Top 25%					
VI – Middle 50%					2
VI – Bottom 25%					1
Unknown					1
	Option 2: No	othing dic	tating which	transfers fi	rst
	1	2	3	4	5
	Least				Most Favored
LM – Top 25%				1	2
LM – Middle 50%	1			1	2
LM – Bottom 25%					1
INT - Top 25%					
INT – Middle 50%					
INT – Bottom 25%				1	
VI – Top 25%					
VI – Middle 50%					

VI – Bottom 25%

1

Unknown



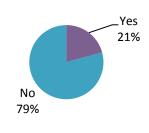


This question is the same as question #2 except it related specifically to NPP draw quota. Of the producers who felt new producers should be subject to different rules, there was no clear consensus of what is preferred: FIFO or nothing dictating which transfer is assessed first.

1

13. Please tell us if there	e is another option to the previous question		
LM – Top 25%	 Perhaps new entrants should have to buy an equal amount of quota on the exchange in order for "free" quota to be theirs. Helps eliminate the "winning the lottery" If this last question pertains to NPP then I have to say they are held captive by 10/10/10. If otherwise, then zero restrictions. 		
LM – Middle 50%	 old producer must be in the industry for at least 10 years . I mean any supply management in BC. 		
LM – Bottom 25%			
INT – Top 25%			
INT – Middle 50%			
INT – Bottom 25%	 This seems to be a repeat question 100% ownership in the first year to gain borrowing equity. Non-transferrable other than to family members for 10 years, then follows the same class/principals as regular quota 		
VI – Top 25%			
VI – Middle 50%			
VI – Bottom 25%			
Unknown	 any given quota should not be able to be sold for ten years unless it is part of a complete farm sale any given quota should not be sold for 10 years unless it is a farm sale 		

14. Do you think 10/10/10 should Program? If No, end survey If Yes, Proceed to question 15		he New Producer
	YES	NO
LM – Top 25%	1	4
LM – Middle 50%	2	6
LM – Bottom 25%		2
INT – Top 25%		
INT – Middle 50%		
INT – Bottom 25%	1	2
VI – Top 25%		
VI – Middle 50%		2
VI – Bottom 25%		1
Unknown	1	2



Twenty-four respondents answered this question, of those, 19 did not want to remove 10/10/10 from the NPP quota.

15. If yes, here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank them in order of preference (5 being most favored approach).

	Option 1: No C	Option 1: No Conditions			
	1	2	3	4	5
	Least				Most Favored
LM – Top 25%				1	
LM – Middle 50%					
LM – Bottom 25%					
INT – Top 25%					
INT – Middle 50%					
INT – Bottom 25%					
VI – Top 25%					
VI – Middle 50%					
VI – Bottom 25%					
Unknown					
	Option 2: 10/1	0/5			
	1	2	3	4	5
	Least				Most Favored
LM – Top 25%		1			
LM – Middle 50%					1
LM – Bottom 25%					
INT – Top 25%					
INT – Middle 50%					
INT – Bottom 25%					
VI – Top 25%					
VI – Middle 50%					
VI – Bottom 25%					
Unknown					
	Option 3: 0/95	/2			<u> </u>
	1	2	3	4	5
	Least				Most Favored
LM – Top 25%			1		
LM – Middle 50%		1	1	1	
LM – Bottom 25%					
INT – Top 25%					
INT – Middle 50%					
INT – Bottom 25%					1
VI – Top 25%					
VI – Middle 50%					
VI – Bottom 25%					
Unknown					

The sample size of respondents on this question was very small. From the earlier responses to the same question one may conclude that producers are in favor of 10/10/10 for new entrants.

16. Please tell us if there	e is another option to the previous question
LM – Top 25%	
LM – Middle 50%	
LM – Bottom 25%	
INT – Top 25%	
INT – Middle 50%	
INT – Bottom 25%	 I think NPP should gain 100% equity in the first year to increase borrowing power but 100% claw back if sold inside 10 years. After 10 years of production should be treated 0/95/2
VI – Top 25%	
VI – Middle 50%	
VI – Bottom 25%	
Unknown	

Conclusion from Second Consultation:

There is overwhelming support from our producers across all region and quota holding segments for the removal of LIFO 10/10/10.

Of the proposed policy changes there were two clear front runners for the replacement of both LIFO and 10/10/10.

- Instead of LIFO, respondents felt that (1) nothing dictating what is subject to assessments, or, (2) FIFO would be a more effective policy for our industry.
- Instead of 10/10/10, respondents felt that (1) a 5% flat assessment, or, (2) 0/95/2 would be a more effective policy for our industry.

Should new policies be approved, the consultation clearly showed that any changes would need to be applicable to all quota held, and not approved on a go-forward basis. A go-forward basis approval would actually result in a GREATER disincentive to transfer quota than current rules as it would make a measurable finish line (10 years) for producers who are on the fence about selling quota.

Succession planning is evolving and many of our respondents would like to see the policy expanded to include transfers from:

- sibling to sibling
- child to parent
- quota holder to nieces and nephews
- grandparent to grandchild
- quota holder to long-standing farm manager

Survey responses were split on how best to treat New Producer Program incentive quota. Some producers in favor of the quota being subject to the same rules as other quota held, while others were in favor of retaining the current rules to ensure that when selected, new entrants are committed for the long term.

Meeting with Graders and Processors

BCEMB invited our graders and processors to provide feedback on the current assessment policy and the potential changes that were put forward in the second consultation.

As graders and processors in a "have not" province, their primary concerns are that quota allocated to the BC board is being produced and assessments are not being unnecessarily held by the board.

The graders and processors are cognizant and supportive of new entrants and non-regionalized production but they also want to ensure that economic factors for other stakeholders are being considered during new entrant deliberations.

Meeting with Financial Institutions

With potential changes in mind, we invited all six financial institutions associated with lending in the supply managed sector to meet with us. Our meetings were focused on what, if any, implications (positive or negative) may result from the changes to assessment policy that were being consulted on in the second survey.

BCEMB staff met with five of the six institutions (four in-person, and one via teleconference). The following are the questions that were discussed and a summary of the responses that we received:

1. If we free up access to quota and it drops in value how does this influence your institutions lending decisions or criteria?

As long as the Board continues to let the market dictate the price of quota as they are right now, banks are not concerned with a drop in value.

2. If we lease quota to New Entrants instead of "gifting" does this affect your lending decisions or credit criteria? Can this be solved with an Assignment of Lease from the BC Egg Marketing Board?

Leasing quota to new entrants would disqualify them from being able to use their quota as collateral for securing loans.

If, however, the Board was to provide an assignment of lease that guaranteed the Board covered the bank of any shortfalls should a default situation occur, that may be something that the banks are open to as it would allow new entrants to use their quota to help secure loans.

3. If we dispense of or reduce the claw backs on a quota sale will this impact your practices?

Banks are supportive of any change that results in a greater share of ownership at the producer level as this would allow their clients (our producers) to utilize their quota to its fullest potential.

4. If we extend the definition of family transfers from Parent, Child, Grandchild to this plus brothers, sisters, nieces and nephews does this have some appeal for your institutions?

No impact to financial institutions so long as the Board continues to notify them prior to transfers.

5. As above if we extend the definition further to existing farm managers with X years' experience does this have some appeal?

No impact to financial institutions so long as the Board continues to notify them prior to transfers.

6. Are there any other considerations that you can think of with respect to quota transfers that might assist the bank?

Quota to financial institutions has value, but it is generally a small part of the overall portfolio held by their clients. Changes to LIFO 10/10/10 are supported by all financial institutions so long as the Board does not accompany any of their potential changes with a "one time" adjustment to the administered price of quota on the quarterly exchange.

Meeting with Legal Counsel

BCEMB submitted all of the proposed changes that are detailed in our Recommendation to our legal counsel, who confirmed that all recommendations are legally sound and in compliance with existing legislation and regulations. A draft of our proposed Consolidated Order changes can be found in Appendix 5.

QUOTA ASSESSMENT TOOLS CONSULTATION

Consultation (Survey Q&A)

BC Egg Marketing Board

QUOTA TOOLS ASSESMENT SUMMARY

Total Respondent Breakdown

	Survey 1	Survey 2
Lower Mainland – Top 25%	9	12
Lower Mainland – Middle 50%	16	26
Lower Mainland – Bottom 25%	8	16
Interior – Top 25%	0	2
Interior – Middle 50%	1	2
Interior – Bottom 25%	8	6
Vancouver Island – Top 25%	1	0
Vancouver Island – Middle 50%	2	3
Vancouver Island – Bottom 25%	0	2
Unknown	0	8
<u>TOTAL</u>	45	77

Survey Summary Synopsis:

In the following pages you will find the summaries of the two (2) surveys that were conducted by the BC Egg Marketing board staff in relation to the Quota Assessment Tools consultation.

Each of the two (2) surveys are broken into three different levels of analysis.

Level 1: Summary of All Respondents

The first level of analysis is a summary of the collective responses received from all stakeholders within the industry.

Level 2: Cross Tabulation of Survey Reponses Based on Variables

The second level of analysis cross tabulated the responses at the direction and BCFIRB. The BC Egg Marketing Board feels strongly that answers from the industry collectively communicate the same, consistent response as the responses broken out and analysed by region & quota holding. The level 2 summaries are cross tabulated to include:

- 1. Geographical Region
 - a. Lower Mainland
 - b. Interior
 - c. Vancouver Island
- 2. Percentage Quota Holdings in Industry

a. Top 25% (27,479 quota holdings or more)
b. Middle 50% (5,951 to 27,478 quota holdings)
c. Bottom 25% (5,950 quota holdings or less)

Level 3: Individual Responses

The third level of analysis displays the individual responses generated from each survey. Individual responses include attributes that indicate the respondent's geographical region, % quota holdings, production mix, and owner/manager status.

QUOTA ASSESSMENT TOOLS CONSULTATION

Consultation #1 PowerPoint Presentation

BC Egg Marketing Board



Quota Assessment Tools Evaluation

April 4, 2017





Agenda

- 1. Opening Remarks
- 2. History of Quota Assessment Tools
- 3. Purpose of the Evaluation
- 4. Evaluation Process
- 5. Evaluation Timeline
- 6. Discussion Questions
- 7. BC FIRB's Expectations
- 8. Closing Remarks



History 2005 Specialty Review

1. 2 year review process

Review specialty products and markets in the supply managed commodities

2. Assessed submissions based on:

- Registration
- Designation of specialty product markets
- Allocation
- Production and Marketing Quota
- Quota Transfer
- Levies
- New Entrants
- Representation

3. Provided Boards with policy directions



Purpose

Quota Assessment Tools Evaluation

To determine if industry and public interest policy outcomes are still being achieved and if there are unintended consequences

1. Policy Objectives

- Quota is intended to be produced
- Quota is transferrable
- Producers are actively engaged and committed to the industry
- Quota is available to commodity boards to support policy objectives, including the development of specialty markets and providing for new entrants in the supply management system

2. Areas of Focus

- Transfer Assessment Structure
- Industry Entry, including transfer assessment exemptions



Process

Quota Assessment Tools Evaluation

1. 2 Stakeholder Consultations

- 1. Provide an evaluation on whether the 2005 Specialty Review policy objectives related to transfer assessments and industry entry are being fulfilled
- 2. Identify what, if any, changes are requested and how they:
 - Meet with the 2005 policy objectives
 - Are supported by industry
 - Reflect the 2004 Ministry of Agriculture Regulated Marketing Economic Policy
 - Fulfill Sound Marketing Policy
 - Fulfill the public interest

2. Summarize Current State of the Industry

- All current quota distribution, transfer and assessment policies and practices
- Illustrate the state of quota movement, assessment and industry entry between 2005 and 2016



What We're Talking About 10/10/10 & LIFO



79



Timeline Quota Assessment Tools Evaluation

 Launch Quota Assessment Website Producer Consultation #1 • Survey Producers Analyze Results • Producer Consultation #2 May • Survey Producers Analyze Results • Discuss Change Impact with Bank Create Recommendation Document June Legal Counsel Review

Final Submission to BCFIRB



- 1. Have transfer assessments limited the transfer of quota, if so, to what extent?
 - Do you think this is contributing to increases in the price of quota?



2. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?



3. Are there changes to quota transfer assessments, or other tools, that could further reduce barriers to entry and increase quota availability?



4. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?



- 5. Do current transfer assessments and exemptions enable producers to sell/transfer their farms sufficiently intact to remain financially or operationally viable?
 - Are whole farm transfers still important for succession or industry health?



- 6. Is the traditional family farm approach to succession changing?
 - If so, what succession changes do you see upcoming that are current?



- 7. Are non-family succession structures important for industry success going forward?
 - If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?



8. Have you transferred quota between 2005 and now?



- 9. How have quota assessment tools affected you?
 - Tell us your story.



10. What, if anything, would you like to change?



BCFIRB's Expectations Quota Assessment Tools Evaluation

1. Summary of quota distribution policies

 Assist BCFIRB with evaluating any proposed changes to transfer assessments and industry entry

2. State of Quota movement, assessments and industry entry between 2005 and 2016

- Qualitative year over year allocations, production split, quota transferred,
 quota assessed, industry entry statistics
- Quantitative case studies from producers and value chain members on transfer assessments and industry entry

3. Consultation Questions

As presented by BCFIRB and stated previously

4. Recommended Changes

 Supported by industry, meet 2005 objectives, SAFETI and Regulated Marketing Economic Policy, fulfill the public interest.



SAFETI Principles

- Strategic Identify key opportunities and systemic challenges, and plan for actions to effectively manage risks and take advantage of future opportunities.
- 2. Accountable Maintain legitimacy and integrity through understanding and discharging responsibilities and reporting performance.
- 3. Fair Ensure procedural fairness in processes and decision-making.
- **4. Effective** A clearly defined outcome with appropriate processes and measures.
- **5. Transparent** Ensure that processes, practices, procedures & reporting on exercise of mandate are open, accessible and fully informed.
- **6. Inclusive** Ensure that appropriate interests, including the public interest, are considered.



Regulated Marketing Economic Policy

- 1. Public Interest operates in the interests of all British Columbians
- 2. National Systems BC government supports the participation of BC producers in national supply managed systems when the provisions of the national agreements are consistent with the growth and prosperity of the agri-food industry.
- 3. Maintaining and Gaining Markets, and serving BC demand supports the development of new markets identified at the production, marketing, and processing level to facilitate industry growth and competitiveness.
- **4. Entry of New Producers -** facilitates the entry of new producers to sustain and renew regulated industries in new and existing markets.



Regulated Marketing Economic Policy

- **5.** The Value Chain facilitates cooperation among producers, marketing agencies, input industries, processors, and retailers, with a view to achieving efficiencies throughout the entire system, and enhancing value in the marketplace.
- **6. Safety and Quality** builds consumer preference for British Columbia product by encouraging the production of high quality, safe food.
- 7. Recognition of Standards recognize, and encourage producers to participate in, the voluntary standards programs sanctioned by the Province and national standards sanctioned by the Federal Government as standards for identifying and labelling specialty products.
- **8. Regional Industries -** contributes to economic activity and stability in all regions of British Columbia.



Questions?

QUOTA ASSESSMENT TOOLS CONSULTATION

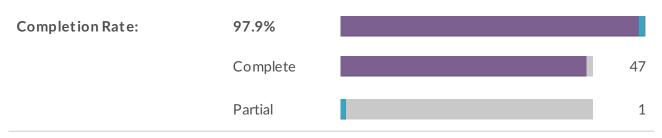
Consultation #1

BC Egg Marketing Board

Quota Assessment Tools Stakeholders

Survey #1 Pooled Response Summary

Response Counts



Total: 48

1. Have transfer assessments limited the transfer of quota, if so, to what extent?

Count	Response
2	I'm sure it has but for me it hasn't yet, with the current demand for quota it will limit my ability to grow. I am a small producer looking to continue to grow.
2	no
1	Absolutely! The proof obviously is the amount of quota put up for sale. I am sure there would have been a lot more available to purchasers if the LIFO policy did not exist. Earlier sales or transfers were due to leasing policy changes and new legislation in regards to capital gains. The assessments have caused a lot of producers to hold back on any quota transfers. I am positive that more quota would become available if the LIFO policy disappeared.
1	As a New Producer Program winner who has not yet received quota, this does not yet apply to me.
1	I believe they have, LIFO , $10/10/10$ assessments have potentially significant financial impacts should a producer want to sell quota. Producers wishing to reduce such penalties would have held back selling quota. To what extent, I can't say , but the financial disincentive is strong, especially in recent years due to the quota increases we have had, so the potential backlog of quota that would have sold could be quite significant
1	I don't know
1	I have not considered transferring quota as I have only owned quota since 2012, but with changes to NAFTA being discussed, selling has crossed my mind
1	LIFO and the 10-10-10 assesment have limited the transfer of quota as farmers who do not want to sell all quota but just a limited amount to create space in barns and or use capital for re-tooling will end up losing more quota than they can afford to lose.
1	Limited quota available because of the assessments.
1	No
1	No

No idea 1 1 No one wants to lose such a large amount of their quota in order to downsize, finance equipment changes or exit the industry. Furthermore, in a whole farm sale the efficiency of the barn is reduced as it is no longer running at it's capacity or at least it's previous capacity. 1 No, not for me 1 No, not yet. 1 No. 1 Not in our case, we have not sold or bought quota, only complete farms many years ago Probably not, but when it started it effected the price 1 1 Transfer assessments has led to an unnatural hording of quota. The current assessments unfairly penalize long standing producers and treat them the same as new entrants. Yes 1 1 Yes they have. The last in first out is keeping farmers from selling a bit or all of their quota due to losing so much to assessments. 1 Yes, 10/10/10 and LIFO have made producers unwilling to sell quota because of the losses they would incur. 1 Yes, anytime an "assessment", "tax" or "penalty" is applied to a transaction, any business person is going to look at whether it is beneficial long term to do so. Given the circumstances today, after multiple new allocations, if a person is going to do anything with their quota, these "assessments" will most certain kill any potential deal. Yes, because of transfer assessments, less quota is available. 1 1 Yes, definitely There is barely any quota available for transfer because no body wants to lose all their allotments because of the 10,10,10 assessment.

- Yes, people are reluctant to sell quota if they know that 5% will be deducted from the sale. Farmers would rather hold onto the quota then sell if it means a 5% claw back. It also inflates the cost of quota as producers don't want to take the 5% deduction, so they inflate the cost accordingly. It also hinders succession planning among extended family and long term employees. Some families don't have immediate family members that want to carry on farming and others have loyal staff that want to get into farming. The assessments detour producers from executing those succession plans. The 10/10/10 LIFO program reduces the amount of quota transfered because producers will hold onto their quota until its saleable
- Yes, significantly by creating 2 major disincentives. Farmers that want to sell their farms lose significant equity upon the sale in addition to tax implications they face. These 2 forces work together to make selling very unappealing. Additionally, farmers who are prepared to downsize as they get older and children lose interest are practically forced to continue farming at their current size because to sell a small portion of their operation they have to face significant assessment levels due to LIFO.
- Yes, there is a reluctance to trade quota due to the inherent clawbacks. Very prevalent, as the clawbcks cause extreme hardships
- Yes, they have deterred potential sellers from putting quota on the market in the hopes that assessments will be adjusted down sometime in the future. The extent is hard to predict as they are on a farm by farm basis.
- 1 Yes, to a certain degree
- Yes. The LIFO and the 10-10-10 rules have prevented producers to put quota on the market, There are prod that would have sold some quota to finance retooling, but because of the claw back have not done so.
- Yes. If the farmer wants to reduce the size of his farm he gets penalized while his downsizing can enable a new producer to start and a smaller producer to grow
- 1 Yes. To the extent that it inhibits our ability to plan for the future.
- 1 Yes. Not sure how much
- Yes. There are already a lot of complications with selling quota (succession, whole farm transfer, capital gains). No farmer would ever dream of reducing quota and buying back later per changing needs due to this transfer assessment.
- Yes. They limit farmers selling quota because they lose so much quota to assessments.

1 Yes. We are limited to the amount we are able to buy 1 limited quota available because of assessments 1 limited quota available because of assessments 1 yes. So if producers want to sell some quota to raise capital to retool they would loose most of their funds from clawbacks. 1 yes. significantly 1 yes... when you review the fact that every quota acution has been oversubscribed.... the clawed back quota during a transfer would in most cases be sold to the purchasing producer along with the original larger sale and thus the production be utilized much sooner than when the quota is raffled off

2. Do you think limited transfer assessments are contributing to increases in the price of quota?

Count	Response
8	Yes
2	yes
1	Absolutely, less quota for sale = higher price, I'm sure there are other factors but lack of quota availability would have a significant impact.
1	Absolutely, when you limit supply due to clawback rules, the demand curve results in a higher price due to the reduced limited supply
1	I do. It's like anything else the higher the demand the price is likely to increase. If LIFO was altered it may ease the pressure with more farmers willing to sell
1	I think market conditions determine price. If there was an abundant perhaps the price will decrease. Transfer assessments stop the flow of liquid quota by penalizing the producer
1	If more quota was available then more of the current demand would be filled. There is a potential for the price to trend down when demand slows.
1	If more quota was available then more of the current demand would be filled. There is a potential for the price to trend down when demand slows.
1	If quota is more liquid I suspect the price would start to level off instead of the continuous upward trend we've been seeing.
1	No
1	No. I believe the demand for to grow or join the viable industry is increasing the price.
1	Quota has always had inflated prices since day 1. My opinion is that as long as there is stability in the industry with COP pricing, quota will always remain a sound investment. And it's supply and demand that should determine quota pricing.
1	Somewhat. As long as egg farming is profitable and the supply managed system is shorting the market, prices will remain high.

- The price of quota is affected by the very small percentage that sells. Reducing or eliminating transfer assessments should increase the supply. Also, it may reduce the urge of a seller to try and make up for the lost quota in the price of what he has left to sell.
- 1 YES!!
- 1 Yes, most definitely.
- Yes, a 5% claw back only means that a producer needs to recoup that loss through the sale of the remaining quota.
- Yes, I believe the transfer assessments have led to an unnatural hording of quotas and resultant increase in quota prices. This hording limits the amount of quota for sale, thus increasing its value as supply is not meeting demand. Furthermore, the assessment and resulting reduced volume of quota to be sold, encourages higher prices as the seller will want to be made whole despite the transfer assessment. Secondary to this, the assessment further reduces the amount of quota available for sale, compounding the situation.
- 1 Yes, and as s new entrant it will only make it more difficult to buy more quota.
- Yes, because farmers don't get full value for the quota they are selling and are less willing to sell, driving up demand and with it, the price.
- Yes, because producers are only paid for a potion of their quota, so they want a higher price to make up the difference.
- 1 Yes, for sure
- 1 Yes, if demand was filled quota prices could potentially trend down.
- Yes, if there was more quota available the price would possibly be lower. As anywhere else, it is supply and demand. Very limited supply: price goes up.
- 1 Yes, low supply/high demand = higher price
- Yes, when there is less people willing to sell quota, the prices are higher. This means only the well-off, large farms can afford the quota to grow.
- 1 Yes.

Count	Response
1	Yes. The less quota on the market the higher the demand, the more producers are willing too pay for quota.
1	Yes. LIFO and the 10-10-10 rule has done just that.
1	Yes. The price of quota today now takes into account for these "assessments", thereby projecting a higher quota value than it would and should actually trade for
1	Yes. The value of the quota is automatically 5% less. So a farmer owning quota wants more when they sell. Also the reduced selling is driving up demand. With grants, the $10/10/10$ LIFO is especially causing farmers to hold out for a bigger payout.
1	Yes. With this present system in place. Remove the LIFO and I am sure quota will begin to move. I myself would have found that much better than having gone through the penalties of the quota assessment policies. I know other producers would release some quota if they weren't penalized by the policy.
1	absolutely limited access means higher prices its called "supply and demand" also farmers that sell want to be paid for their entire quota therefore increase the asking price to cover the clawback
1	no
1	no idea

yes, the more quota on the market the less the price will be - the more limited we make

yes, creates an artificial shortage

quota the more people are willing to pay to acquire some

1

1

3. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

Count	Response	
3	no	
1 . I think transfer assessments impact new entrants by limiting their ability to grathe high quota value. Conventional producers are affected by the assessmen limiting their ability to sell some quota (without further penalties) to further in their operation.		
1	Addressing this as new entrants, our ability to grow is greatly hindered since we don't have the equity in the quota to borrow against to grow. Start up costs are high.	
1	As a new entrant, the limited supply of quota available for purchase makes it difficult to expand the production unit large enough to be a sole income for a family.	
1	As a recent new entrant, we purchased a nominal amount of quota. Had more been a viable, we would have purchased more. Perhaps if the environment was a bit more liquid, we would not require "free" new entrant draws and that allotment could be set aside for new entrants to purchase. This would be much more fair and transparent that picking winners and losers	
1	As far as I am currently aware they affect all producers the same.	
1	As far as I am currently aware they affect all producers the same.	
1	Because of 10-10-10 we don't have the equity to purchase quota as new entrants	
1	Because of 10-10-10, we do not save equity to purchase quota till after 8 years in production.	
1	By limiting quota and increasing price it makes it far more difficult to locate and afford quota for new producers hoping to reach a critical mass. When planning new facilities or renovations it makes it more difficult and less efficient to build and plan for growth. When assessments are used to make quota available to NPP's it can create resentment from "some" current producers.	

I am a new entrant. I knew full well of the rules when I started so I accept that. A

selling an quota because of the claw back

conventional farm that has been in the industry for 15 plus years is greatly hindered of

1

1 I believe that specialty producers should not be assessed the claw back, because the processors are short of organic product, nobody wants to produce this product; then take a lesson from the dairy industry who issue permits for more production as needed, to whoever can grow and produce the product required, like organic 1 I do not believe so Ido not know. 1 1 I don't think these categories are impacted differently. The impact is felt rather equally for all producers aiming to grow. New entrants that have received their quota through the new producer program are impacted differently than those that bought in simply because realistically they can't sell, but that's about it. 1 New entrants, if drawn names, directly get the assessment quota. If they are just new producers who bought in, then everyone is the same when it comes to selling, all new growth for all is assessed the same way I believe? 1 New entrants should still have the 10/10/10 rule to keep that program fair. All new entrants should be started with the plan to continue farming for many years. 1 No 1 Not really Not sure 1 1 The impact, if there is a difference, is still a negative impact to all producers. 1 The only restriction on the last exchange was the inability for free run/range to purchase quota. The producers responded overwhelmingly to take birds out of cages and now they are restricted in growth, which they need to help pay for the investments they were encourage by the board to make. 1 They impact everybody because there is not enough quota going on exchanges because farmers don't want to lose so much to clawbacks. In turn this is driving up the price of quota.

- Transfer assessments impact each type of production differently and each producer differently. If transfer assessments, mainly the 10-10-10 rule, were introduced to stop new entrants from selling off their newly acquired license to produce, then it has been successful but it has had other negative effects as well. It has penalized established farms, reducing the likelihood of selling off portions of quota to other producers and/or family.
- YES! We have purchased quota, however our base quota is new entrant quota. If we wished to sell our purchased quota, we would be looking at a very big loss. We may not even be able to sell any as according to LIFO, we would have to sell our New Entrant quota first, but that we can't do according to 10/10/10.
- 1 Yes
- Yes it does impact new entrants differently. When we entered the program 13 years ago it was 10 + 5% and now it has change to 30% for us. Less quota on the market promotes higher prices.
- Yes the 10-10-10 rule is the same for all. LIFO effects specialty and conventional producers in a way that part of the quota would be clawed back if they sold part to finance retooling.
- Yes, as a new entrant I want to start my business knowing I can expand. We are building to be able to grow but we can't get equity before 10 years. A 5 years plan would make more sense.
- 1 Yes, new entrants benefit from the assessments
- Yes, with me myself being a new entrant I feel it is increasably hard to grow to a family supporting farm. This is due to the fact the 10/10/10 program makes banks not want to lend against quota that is not truly my farms quota.
- 1 Yes. It all depends what is available
- Yes. Under LIFO, specialty and conventional producers are being assessed a clawback even tho they have been producing for 10,20,30 years. Where an new entrants have just started. FIFO would be more fair for all producers.
- Yes. The declining transfer assessments cannot be used as security to purchase additional quota or other financing. While 10/10/10 does have the potential to help prevent flipping for a gain, there have been loopholes employed that are unfair to others playing by the rules. A level playing field should exist for all.

- because of 10-10-10 we dont fave equity to purchase quota til after to 8 years in production
- less access to quota means higher quota prices... higher quota prices means more cost for a new producer to expand by purchase than it does an existing producer
- 1 no idea
- transfer assessments create a disincentive to sell for all producers. In the case of new entrants this may be desirable, however I feel there may be better ways to incentivize new entrants to remain and grow in our industry.10/10/10 in particular for new entrants, has restricted their ability to borrow and expand. I would suggest eliminating 10/10/10, and replacing it with attaching new entrant quota to a specific property for 10 years. This would remove the unintended consequences of 10/10/10, while still creating an incentive for new entrants to be engaged in farming long term
- yes, assessments restrict the movement of quota sales for all categories. New entrants cannot sell their new entrant quota, they have to run two classes of quota. If they were to purchase, they have the inability to transfer among family. They also struggle with purchasing large amounts of quota based on cash flow, and small lots of quota don't come up for sale because its not equitable for mainstream producers to sell small amounts and take an assessment. Mainstream producers who want to buy whole farms may see upwards of 15% less quota on that farm as a result of the sellers assessment and 10/10/10 LIFO circumstance. This makes whole farm purchases inefficient and less desirable.

4. Are there changes to quota transfer assessments – or other toolsthat could further reduce barriers to entry and increase quota availability?

Count	Response	
2	Yes, if all transfer assessments were taken away it would open up more access to new producers and current producers.	
2	no	
1	10-10-5? A pro rata penalty across all quota vintages that a farmer has	
1	5% clawback on farm and quota sales	
1	A policy change to a "First In, First Out" scenario for selling of quotas would be much better. It will keep new entrants from being able "flip" quota licenses, keeping out speculators. FIFO would increase quota availability, as established producers would more willingly sell off portions of quota to suit their business and future plans. Using FIFO, the hens available to be transferred with only 5-10% transfer assessment would help to ensure our market for eggs is supplied and not lost to a pool for future producers. Another policy change could change a 10-10-10 to a 50-5-10. In FIFO is not a good fit, then I would suggest a scale similar to 10-10-10 just starting at 50% immediate quota value, diminishing to 10% transfer assessment in 5 years (10% more per year). Currently, if my farm were to sell all of its quota only 80% would be able to be produced by the purchaser; this is bad news for a short on supply province trying to supply its market.	
1	At this point I feel FIRB wants a handle on the movement of quota and the approach seems to work, other than it drives the price of quota up to quickly. I feel there should only be one increase a year at the very most.	
1	Availability is not an issue	
1	Bring in FIFO (first in first out). There has been lots of new entrants picked now so there is no need for any clawbacks.	
1	Changing the 10/10/10 and lifo	

- 1 Changing the 10/10/10 to a 5 year plan and changing LIFO to FILO would help. I'd also like to see the price of quota on the exchange only go up \$5 annually. Right now producers know it will go up \$20 a year (as long as there is quota available on the exchange) and some producers are holding off selling because they know the price will be much higher in a year.
- 1 I have no new ideas
- I personally am of the opinion that with our system we all should pay for quota. I realize the government wants to impose new entrants policies on us. We have spent many years purchasing and paying for quota and this business should be treated like any other good business. It costs money to make money. We have 2 sons who got into the egg industry by making all the right investments to be able to farm. No freebies in our family.
- 1 No ideas
- 1 No, transfer assessments should be eliminated to allow engaged producers to grow.
- 1 Not penalizing producer on the sale of quota might help to make it more available on lower the price. Give smaller farms first choice to buy that quota.
- 1 Reducing, eliminating and speeding up the 10/10/10 to 50/50 will make more quota available. Making it retroactive for past issuances will make more available even faster.
- Remove the LIFO policy completely!!!! Why in the world was it ever created (and with not much forethought I might add). Also the 10/10/10 rule should be removed. Another stumbling block for producers. I understand how it could work for new entrants to stop them from just turning around and quickly selling the quota to make a fast dollar, but I believe that producers who are already committed to their farms should not be penalized more than the 5% they already are. Have new producers fall under the 10/10/10 rule to show their commitment perhaps?? Here's a question to you.....if the market changes for whatever reason and demand falls and quota must be cut (and that has happened in the past) is the 10/10/10 rule going to apply to quota cuts as well????? I doubt it! And let's not forget the amount of extra paperwork and time being spent on these assessments/policies!
- 1 Remove the 10/10/10 rule. Remove any restriction limiting or preferring any interested parties. Reduce the transfer of layer quota policy to a simple policy document.

Count Response 1 Removing transfer assessments would greatly help increase quota availability. Currently, these quota is intended to fuel the new producer program, but by increasing the amount of quota available, new producers will have the opportunity to buy in and we will not need to rely on the NPP. 1 Switch to FIFO 1 Switch to fifo program Switch to the FIFO system. First in first out. 1 1 THe 10% holdback of new entrants could be sold ...that way any new entrants can get in if they wish 1 We would like to see transfer assessments reduced or phased out in certain cases and/or classes. BC is in a massive deficit in egg supply, importing millions of eggs to meet our own demand. We would like to see major effort made to use that available supply space when allocating quota to New Producer Programs, or possibly making quota available through the exchange until we reach a supply/demand balance. There is no reason BC can't produce all its own eggs. 1 Well the 10-10 or first in out thing will effect. If an old producer could sell "old" quota and free up space for new, there might be more shake loose. Probably too late now, everyone has expanded? 1 Yes change LIFO to FIFO 1 Yes, changing to a first in, first out assessment would reduce a barrier. Also, giving people the ownership of more quota in the new entry program sooner would allow for quicker and greater growth. 1 Yes, if we eliminate the last in first out more quota will become available 1 Yes, remove the LIFO 10/10/10 and the 5% clawbacks. Fund the new entrant program through market growth in allocation. If there is no growth, then take it out of the industry allocation. Either way, its still funding the program. Finally, increase succession planning opportunities for farmers by allowing them to sell to extended family and

employees without ramifications.

Yes. Change LIFO too FIFO.

1

. . . .

- Yes. If you would away with the 10, 10, 10 and put another fair transfer assessment in place to all different commodities, there would be more quota available for new entrants to access and start a financially feasible production unit
- 1 Yes. Lower the clawback to the original program.
- Yes. we can have any increases not able to be produce to be put on the exchange, we shouldnt hold it for 3 years for a producer. If he cant produce it put it on the exchange or back in the pool for producers who can produce it
- Yes. I believe there are many changes that could be made. Currently, there are only two ways to enter the industry: buy in, or 'win' through the quota lottery. I believe the industry is missing out on passionate people because of these barriers. There needs to be another way for people who are passionate about egg farming. Consider developing some new entry programs through: Research quota Leasing quota Having a smaller quota buy in (currently the minimum quota buy in would cost \$144,000 which is absolutely un-achievable for hard working small lot producers)
- Yes. Switch to deemed assessments. Advantages: 1) encourage more selling. 2) the deemed assessment amounts could be used to encourage more New Entrants. Furthermore I heard of concern over "stale" quota credits. Could a fair method be used to put this into a quota credit pool to help out new entrants? Many of them cannot get new quota.
- more fluidity means lower quota prices.. thats a lower barrier.. continue with the lottery from quota increases only opposed to clawback.. other than that... I dont understand the obsession with "new entrants"
- 1 no idea
- yes change LIFO to FIFO rather than 10-10-10 how about making full ownership over 5 years so that new producers would have more equity sooner to expand there production
- 1 yes there are barriers for new producers to overcome, but this lets new entrants be true and show they will work to be in the industry.

5. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Count	Response	
3	No	
2	Yes, via a new entrant program. This program has been a really good success and the industry has many new producers in the industry. By removing the transfer assessment the industry can move forward with a focus on helping these new producers and all producers continue to grow.	
1	"back yard / unregistered "producers producing without quota has always been an issue in our supply managed industry. However, I believe having a successful new entrant program in place is one of the ways we can mitigate these issues	
1	Almost every new person we know in the industry is in through the New Entrant Program.	
1	Apart from entering the New Producer Program, I only know of people who were able to enter the egg industry because they were already involved in another supplymanaged industry previously.	
1	Buy quota or go in via new entrant program.	
1	Don't know, but new entrants can certainly buy the necessary quota to participate in the industry, as evidenced recently.	
1	Don't know?	
1	I do not know of other ways for new entrants to enter. For them to go out and just purchase the quota is difficult enough when banks are hesitant to lend when they have no quota to start. The new entrant program can work as long as there is quota available for them. Perhaps when quota is allocated to the province a portion of that should be set aside for new entrants.	
1	I don't know, other than inherited farms, family's working together, outright purchasing farms, free quotas from draws. Integration etc.	
1	I'm sure there are a few whole farm purchases, but we aren't aware of them. Before we won NPP quota we tried on two occasions to purchase a whole farm and the cost of	

quota and assessment loss by the existing producer were too big of barriers for entry.

1 If there is more Quota available. People who would like to buy small lots of quota would have a greater chance of acquiring it. 1 If there was more liquid quota available there would be more new farmers. On the last quota exchanges more new farmers started then required from the new entrant program. If we take the quota units on make them available on the exchange we wont need that program. Plus if there was more quota transfers of a lesser clawback there would be also more quota units available 1 Many are purchasing quota on the revised exchange program. Also, farm succession planning is bringing many new producers into the industry. 1 New producers are entering the industry by way of succession planning. Families are passing down there farms to their kids by way of in family purchases. This is the definition of "New Entrant". Its bringing new blood, perspective and idea to the industry, and should be classified as a new entrant. If you consider this, the industry is taking on more than 1-2 new entrants a year. 1 Not sure 1 Not sure, but as a small lot permit holder now, I feel if any one really, really actually wants to be an egg farmer as a career choice. The best way to start is at the "bottom rung of the ladder" as a small lot permit holder and go from there... 1 Not that i know of 1 Some have entered by purchasing quota. 1 The fairest way is for them to buy into the system, as most of us have done. Regardless if you want to farm in the layer industry you need money to start up. I feel some folks think this is a free lottery to become wealthy in. It is not. It is to encourage new farmers to the industry. 1 The only new entrants I know of are, new producers and younger generations taking over family farms. I only know of a few produces that have come into the industry 1 There are people wanting to enter the industry by buying 5000 to 10000 birds not true NPP

Count Response 1 There have been a couple of ways new producers have been entering the industry. Besides new entrants who have been given quotas, there are a few new producers who have purchased quotas. 1 Through the new entrant program and the quota exchange program. Both are successful and have allowed for several new producers to join the egg industry in BC. 1 Um...no. 1 Unless the parents give the farm to their children or win the lottery there are no other ways but buying some existing producer out in order to start farming. 1 Urbanization creates misunderstanfing of the farm life... people dont grow up wanting to be farmers unless they are raised on the farm... your new entrants,, if you want to call them that will 95% come from within 1 Via purchasing quota off of the exchange 1 We don't understand this question. 1 Well, the new exchange allows anyone to buy quota if they really want. It just limits the amount we can buy which may effect cash flow for new guys. 1 When I bought my farm many years ago most of the farmers were older than me and now most are much younger. Not all are family transfers, so people find ways to do it. It wasn't easy to finance when I started and it's not easy now, but then it's not easy to buy a house either. 1 When quota becomes available, they have a chance 1 Whole farm sales, purchasing quota on the exchange, new producer program and succession are the only ways I know of. None of these are very prevalent. 1 Yes - some coming from other sm commodities. Others are entering after having unregulated flocks or sold out other businesses. 1 buy quota like everybody else

there are some people who are entering the industry by just buying quota when available on the market - this is why we need to increase the liquidity.

purchasing farms, quota exchange

1

6. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

Count	Response	
3	No	
1	?	
1	As a new entrant, the idea of being able to past the farm down to our kids is the main reason we got in to it. With the size of some of those farm it's not a family farm anymore it's more like a factory. I think trying to keep farms from getting too big would help to keep them in the family.	
1	Family farm succession will always happen. But, there seems to be more young people interested and trying to enter agriculture from a non-farm background/family. I see long term buyouts of farmers (with no interested children) by non-family employees or farm managers.	
1	How would we know if there are changes to family farm succession?	
1	I am very new to the industry and do not know enough to help.	
1	I believe assessments as well as quota price, have changed the ability of sons or daughters to be able to buy the family farm. Addressing quota liquidity issues, such as LIFO and 10/10/10 should help on this front as well.	
1	I do not see this changing. Family farms will continue to be passed down from one generation to the next.	
1	I do not see this changing. Family farms will continue to be passed down from one generation to the next.	
1	I don't believe the 'traditional family farm approach' to succession is changing. Take a look at how many of young producers are involved in the industry today.	
1	I don't know.	
1	I feel there is not a great deal of change. If someone in the family is interested they will make arrangements to continue the family farm. If not it will be sold	

- 1 Istarted farming for my kids. Farms and family go hand in hand, we should encourage not hinder family succession. No family direct family member should be penalized for taking over the family farm. This is the backbone for farming
- I think there are some instances where a farm owner may be interested in making the farm manager part of his/her succession plan would love to see barriers removed so that could happen right now farm owner gets hit with a 5% clawback as well as clawback on growth which may inhibit the profitability of the farm as it is not operating at 100% capacity it hurts cashflow
- It is becoming more and more difficult. Small farms are not easily viable any more, the margins are very small. Quota grants pad the lining of huge farms, but 3% on a small 3000 layer farm does barely anything to help their performance. Could grants instead go into the pool to be bought, or given preference to smaller farms at a reduced price?
- 1 It is changing. I find that some producers are wanting to involve extended family and long term employees in the succession of their farm. The current assessments hinder that approach.
- 1 No comment
- 1 No real changes
- No, don't think so, there should be room for manager/ operators to become owners of farms without severe clawback issues. Some of these guys have operated farms on behalf of owners for a number of years, and that needs to be taken into consideration, including tax laws and other severe obstacles, which are very restrictive. If we want to keep these guys farming, give them a reason, not an obstacle course!
- No, one generation will continue to pass it down to the next generation.
- 1 Not sure
- Split Fam farm between children and farm manager / worker
- There is always change in succession. Traditional is becoming a thing of the past it seems. There are becoming so many more dynamics regarding the family farm coming into play. As it sits now transitions are not allowed to revert back in the family without the quota transfer assessments coming into play. This seems very harsh when you consider family farms. Why should a parent be penalized if they are trying to save the family farm from situations that arise from children...ie...falling out between brothers and sisters, financial reasons, or divorce etc.

- There is some change from the direct line of parents to children expanding to siblings or nephews/nieces. I've also heard of some wanting to pass down to long term farm managers.
- 1 Transferring between siblings should allowed without the transfer assessment.
- Transitional thinking and approach is that quota would move down to children. The new trends are that succession may actually be a sibling to sibling transfer, but seeing there is no exemption, these transactions are being deferred, which stifles change. Also one can envision reverse transactions up the chain. I.e. A farm succession to kids may revert back to the parent and have a clawback trigger in due to either a child death, sickness, or marital issues. Due to these risks of a one way exemption only, parents are not as prepared to engage any succession plans too early as the risks and costs could be to great if the farm comes back to the parent.
- 1 We don't really know.
- Well the family farm is now a bit bigger. The guys involving their kids now, are mostly bigger quota holders. They expanded to bring in the crew.
- 1 Yes sucesssion to other family members, cousins, nieces, nephews
- Yes and no. Succession planning may include a non-relative farm manager.
- Yes there are changes. Many farms are companies and farms are so expensive that kids can't afford to buy them outright so creative succession plans have developed
- Yes. It is going to be more and more large enterprises which are not family farms anymore. If people cannot get started in the industry because they cannot access quota the family farm will disappear.
- Yes. I think succession planing needs to take divorce into account across three generations. It needs to be simple, and quota needs to easily be sold without such a loss, to pay out a leaving party.
- 1 no idea
- 1 notes
- yes, more children of farmers entering the business

7. Are whole farm transfers still important for succession or industry health?

Count	Response	
9	Yes	
5	yes	
2	Absolutely!	
2	Yes	
2	Yes.	
1	. Whole farm transfers are always important for succession and industry health. The more quota that is traded shows a viable industry	
1	100%	
1	Absolutely! There has to be a mechanism for retiring or exiting producers to get out of their property/production unit without having to completely tear down existing and useful equipment and buildings. Once the quota is gone from a farm the facilities are more or less useless. Its also very, very important to make these opportunities available for new and prospective producers to get in to the industry without the huge cost of building all new production units.	
1	Absolutely. I hope one day to buy my fathers farm. If a whole farm transfer is not possible, I will never be a farmer. The quota will be sold on the exchange and divided up 30 ways. Some to already huge farms and the land will have to be sold also.	
1	Well that would be nice if there were some whole farms transfer, but most are large in price and are now for the big guys only	
1	Whole farm transfers are essential to maintain an efficiency in farm succession. If it is possible to keep a farm operational during a transfer as opposed to leaving it vacant and constructing new it is much more efficient. Also, it gives opportunity to those who do not fall into the exemption categories for transfer to at least keep the farm some what intact, particularly if assessments can be reduced.	

Count Response 1 YES!! If whole farm transfers don't happen, 'whole farms' won't exist! They will all be subdivided and cleared for shopping malls. 1 Yes - many of these will take place in the next 10 years. 100% of quota must transfer no claw backs 1 Yes absolutely!! 1 Yes and no. The egg board should implement what the milk board does: half of the quota goes with the sale of the farm and half of the quota goes on the exchange so that not one person can scoop up all the quota 1 Yes to both succession and industry health. Otherwise farmers would try and stay on until their barns and equipment is worn out or obsolete. Whole farm transfers lets new farmers take over with immediate cash flow and they're more likely to modernize facilities than would older farmers waiting to exit. 1 Yes, farm transfers allow new producers into the industry. Like any industry, purchasing an operating business is much simpler then starting from scratch. whole farm transfers are better for succession planning. 1 Yes, we want to keep our children interested in farming and make sure that it's an attractive life style for them. They are the future of our industry, if we don't let them take over, we'll end up we just a few mega farm run like factories. 1 Yes, it seems to us that with the price of quota so high, we would be greatly reducing the opportunity for whole farms to stay whole if there isn't succession. 1 Yes, there are lots of farmers looking for another farm to help start their children. 1 Yes, they are still important. Yes, whole farm transfers are more stable 1 1 Yes. 1 Yes. to make it viable for succession we need to have whole farm transfers to imediate family members at no penalty 1 Yes. It is important for lots of farming families that the transfer of quota to children who want to continue farming be in their best interest. If not the farm and quota get sold,

usually to another farmer, which goes against wanting more new people in the industry.

1

yes, - how do you sell a piece of property with a modern big empty chicken barn on it - farm worth more when it is operating. Some people may want to re-locate older run down farm with a newer modern farm and increase in size.

8. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Count	Response	
2	Don't know	
1	?	
1	Absolutely! Anyone seeking funding to purchase a whole farm needs to present a viable business plan to investors. Without that, a whole farm transfer to a non-family member is unlikely.	
1	As I understand it, quota can only transfer down to children free of assessment, not up. Also long time farm managers wanting to buy shares in a farm trigger assessments. Removing as many barriers to quota transfer as possible, is important in my view.	
1	Employers that may wish to become a partner	
1	I suppose a case could be made for a long time manager/employee.	
1	I am not yet Familar enough with our industry to comment on that.	
1	I believe that for some it is important to go forward in their situation. What if the child or children in the family died? What if you had a farm manager that you would like to enter or take over your business? Myself I can't really answer what tools would support this approach to succession, but I am sure ideas will be brought up on this question by others.	
1	Idon't know	
1	I suppose a case could be made for a long time manager/employee.	
1	I would like to think so. I would think the transfer assessment exemptions should be the same, but a rule could be in place that would hinder the new producer selling without triggering the assessments.	
1	I'm not sure	

- I'm unsure how important it is for industry success as it seems to be a fairly unusual exception. I think if any changes are made in this area it should be done cautiously in order to protect the family farming standard in BC as opposed to it becoming more of a large corporate structure or equity fund.
- 1 Not applicable to us
- 1 Not sure
- 1 Not that important
- Perhaps assessments on whole farm transfers could be exempt under a certain number of birds when the purchaser was new to the industry. So a huge operation could be incentivized to sell/split to smaller operations. Thus supporting the "family farm" concept in new farms that were not family before. What is important is that the playing field is even for everyone and loopholes do not persist, as these will break the industry apart.
- The removal of any and all exemptions to quota transfers would make quota more available. Apply a flat assessment on all transfers, with the removal of 10/10/10 and quota will be much more available to anyone and everyone.
- There is a place for non-related parties, however that may leave room for dishonesty in the succession process.
- This is a tough question. It would be extremely hard to draw a line of who would be included and who would not in this. I don't know of any examples of non-family succession plans at this time.
- 1 Unsure.
- Well if the larger farms could scale down in size for family transition, it would be easier for new generation without penalizing the old
- Yes, the industry needs new producers with new ideas, and the only way to do that is by having a method in place to organize both non-family and family succession structures. New entrants are not only lottery winners, but also the next generation of farmers. This should seriously be considered when making changes.
- Yes, non family succession plans are very important! There needs to be a mechanism in place that does not punish a new/manager producer, and does not place an undue tax burden on them, more of a tax issue probably

- Yes, non-family succession structures are important as it gives flexibility in succession planning and hopefully allows smaller farms to continue as independent production units, as opposed to the production ending up at larger farms.
- Yes, take a long term farm hand or a farm manger that has worked a minimum of 10 years on farm and allow them to be treated like a family member transfer.
- Yes, we could take a farm manager that has been employed 10+ years and treat like a transfer to family
- Yes, young and new farmers are by and large open minded and excited about improvement, innovation, efficiency, animal welfare and consumer connection. Whereas older, retiring farmers on average are probably not so much. It is very important for the health and success of our industry that there are not too big of barriers for new farmers from non-farm backgrounds. Tools would be anything educational mentorship programs with current producers etc. Also, some form of a lease to buy exemptions would be great that could go along with a record of employment for employees taking over a farm from a non family farm.
- 1 Yes.
- 1 Yes.
- 1 Yes. same assessments exemptions should apply to the non-family succession plan.
- Yes. As there are farmers without children or family heirs, some may wish to leave it to their managers. I feel this should be treated as if a family member/ child received the farm. There should be no claw backs in a case like this. Scrutiny should be done in cases like this, ie timelines of service to the farm.
- i am unaware of this situation. I am saying stop penalizing the right for a farmer to transfer one bird of quota or the whole farm. Its a tax.
- 1 no idea
- 1 not as important as in family
- 1 yes
- 1 yes great way for new people who are already involved in farming and know the industry to be involved in the industry. the same tools should apply as to family.

yes take a long term farm hand or manager thats worked minimum 10 years of farm allow thrm to be treated like a family member transfer

9. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

Count	Response	
13	No	
4	no	
3	Yes	
2	No, I have only purchased quota off of the exchange.	
2	No.	
1	No major purchases or sales	
1	I have purchased quota from the exchange.	
1	Mo	
1	NO	
1	No We have been trying for the last two years to access quota	
1	No - I became a producer in 2004 as a family succession producer.	
1	No I am purchasing quota to grow	
1	No. Still waiting	
1	No. I have purchased quota.	
1	Not in table egg,but in others yes	
1	We purchased quota	
1	Yes Ihave.	
1	Yes,	

Count	Response	
1	Yes, I sold some of my quota in 2012	
1	Yes, I was a shareholder with my siblings and sold our shares to my sons.	
1	Yes, we have purchased quota on the exchange.	
1	yes - family succession transfer from parents to children	
1	yes purchased on quota exchange	

10. How have quota assessment tools affected you? Tell us your story.

Count	Response	
1	As a new entrant, it allowed me to begin my life long dream of owning and operating a family farm	
1	As long as we stay farming with no plans of expansion I do not believe the assessment affects us, however if we want to expand or re-tool the assessment effects us in that there is very little quota for sale on the market as farmers do not like to get penalized to sell their quota. so they will not put for sale.	
1	Because of the small size of farm to start with, new entrants are unable to grow for the first 8-10 years. This is because of lack of cash flow.	
1	Because of the small size of farm, new entrants are unable to expand do to lack of cash flow.	
1	Have not affected me as of now, but would like to see LIFO changed to FIFO	
1	Have not at all	
1	Haven't to this point, upon him leaving the farm either from complete transfer or death this will become an issue	
1	I am a new entrant trying to grow my farm. It is hard to do when there is very limited quota available on the exchange. I purchased quota from the exchange before I could use it because I'm not sure there will be any available when I need it.	
1	I am past retirement age and do not have family to take over, we are faced with having to change cage systems in the future, even though our barn and equipment has many more useful years left. After 45 years in this industry I do not want to write off quota that I have accumulated as well as not get any realistic value for soon to be outdated barns. When the assessments are reduced or eliminated we will sell. Furthermore, the CRA hadecided to take a larger share of quota sale returns, making the matter that much harde to accept.	
1	I have only been farming for 5 years and they have not affected me yet. However if quota is not made more available I do see a problem for small producers.	
1	I have only been farming for 5 years and they have not affected me yet. However if quota	

is not made more available I do see a problem for small producers.

- 1 I have purchased a whole farm where assessments reduced the total amount of quota transferred resulting in reduced barn densities and ultimately a less efficient farm. Assessments make whole farm transfers inefficient.
- I sold dairy quota in 2008 and bought layer quota. I lost 5% to clawback when I sold the dairy quota. Yes of course it would have helped us financially if I didn't lose 5% of the dairy quota to clawbacks. Everything we do goes back into the farm so we can stay sustainable and hopefully help our children take over and continue farming.
- I wont be able to sell quota to help my farm. The penalties are a kick in the ball. No other body has these type of restrictions. Not since the days of Stalin is someone trying to depress the growth of an industry. Need to question the true intent and role FIRB plays in our industry. FIRB is anti farming. They just dont get it.
- 1 If the last in first out had not been there I may have sold some quota rather than renovate a barn
- In 2012, my farm tested positive for SE. The subsequent flock destruction, lack of sufficient insurance compensation, caused us a significant financial burden. At the time we had only purchased the farm a few years prior and still had a very high debt load. We made the decision to sell some quota to reduce our debt, so we would be more resilient to shocks in the future. Had it not been for this incident we would not have sold quota, especially with the assessments it triggered. We were assessed a little over 1800 birds, only 600 as a result of the 5%, but over 1200 due to LIFO and 10/10/10. We remain producers, and plan to continue for the forseeable future, if there was ever a chance that the LIFO / 10/10/10 assessments we were subject to could be reversed, we would love to produce those bird again, as the only reason we sold was due to unforeseen circumstances beyond our control.
- 1 My parents have a bunch of quota under LIFO 10/10/10. If they sell the quota to me and my siblings, they will lose that quota.
- 1 No problem, as it was a transfer of shares.
- No body is willing to sell because of the assessment, so, as a new producer, I cannot even buy quota to get into the industry
- 1 Not so far however we would like to buy in the future.
- 1 Not yet, but we are feeling out current producers for a whole farm transfer and it is definitely a discussed barrier for a sale.

- The only negative that has happened, is that we are restricted in purchasing quota because of the type of birds we have. I understand the market place has enough of a certain product, but the board must accept some responsibility for this as we were all encouraged to go cage free. The market will determine what it wants to buy. I feel the board should not determine what the market wants and the producer carries all the financial responsibility.
- 1 They have affected us because they have changed our future plans.
- They have hit me very hard. I have just recently and reluctantly placed quota for sale. My situation is that I do not have the room to utilize the quota that I have been allocated. I did retrofit an existing shed/barn on my property to house the allotments from 2009/10. The most recent allocations which totalled 11.2 % I have not been able to utilize. With the removal of the ability for the producer to lease their quota, I have no choice other than to sell quota. Of course I could also build a new barn/s. Unfortunately my situation at this moment in my life is that I am not sure which way my child wants to go as he is still to young. If I build now I would not see my return on investment for many years to come. For me I would be at retirement age by the time my farm restructuring was paid back. The idea of selling my land is at this moment out of the question. So this only leaves me to sell quota (since I don't have the space to house, and can't lease) which could assist me
- 1 They have not had a significant affect to this point
- 1 They haven't yet.
- We are greatly affected by the 10/10/10 assessment tool as new entrants. We have built in growth to our new farm, with a barn with space for more quota. Our greatest barrier to growth is that we can't borrow again our quota because we don't own it yet.
- We had an agreement for sale with a farmer who was retiring prior to any clawbacks came in to place. We leased his quota and rented barns to house their quota and build up capital to purchase the quota as per our agreement. Then the rules changed and due to the clawbacks and the forced quota exchange....this fettered our deal and was too costly for either party to conclude any arrangement. As a result we leased the quota another 10 years as he and others held fast. HAd the rules not of changed they would have sold 10 years earlier. It served the seller well, but not the purchaser as we invested time and money and at the end of the day had to pay much more for only a small portion of that quota when it finally was let go and went on the exchange . True story!

 amongst other 2-3 cases that we were made aware of.
- We have had to do some renovations, but with assessment we have been getting, it more or less evens out with the cost of these renovations

1 We won quota through the NPP. The 10/10/10 rule has affected us. We agree that NPP quota holders should adhere to a different set of rules, and have a long term commitment to the industry. The 10/10/10 as limited our access to financing. The banks will only fund on 60% of the quota value, and as we don't see that in the first year, we were unable to get the full amount of capital needed. However, we are fortunate to have eventually found a bank that was willing to work with us, and fund based on future quota holdings. 1 Well it will change the number to sell, but has raised the price of the quotas when it first started 1 Yes they have by the price not being viable for young produces to start there own farm. 1 Yes, we are currently in succession planning on our family farm. The current limitations on exemptions have caused delay in this process as it is unclear whether some of my younger siblings will want to be involved or to what extent. Due to the fact that once I receive the quota I will not be able to transfer it back to my parents or on to my siblings we have to delay the process to avoid moving forward too aggressively and being stuck in a situation where we'd like to transfer quota to an additional sibling, but cannot do it without being assessed. This has caused some major planning challenges and we attempt to split up the farm amongst the siblings without breaking up the quota. 1 Yes, we would have liked purchased more quota 1 Yes. Quota has not been very available for expansion. I received 5000 TRLQ in 2003 which has given me a start in egg farming, for which I am very thankful. 1 hasn't yet but will affect in future 1 ive purchased at higher prices because sellers want to make up for the clawback 1 no 1 small size of farm new entrants are unable to expand do to lack of cashflow sold majority shares in two farms to children where there where no assessments taken. 1

11. What, if anything, would you like to change?

- -Remove the LIFO and change to FIFO (personally quota should be quota...don't start or continue creating specialized quota. We all know what happens when certain things become specialized....it creates problems!!!) -Remove the 10/10/10 rule for established producers in the industry (Apply to new entrants only)? -Remove the Service Fee/Levy on the EFP portion of Quota if the producer is not able to Utilize the allocated quota for that program. I have been paying and don't even have the birds placed (and are unable) to produce such product....highly unfair! -Perhaps bring back leasing to producers with utilization problems. Now that the producers who were just leasing and not producing have been removed maybe it should be reinstated??
- 1 ????
- 1 Allotments should be available to current producers instead of new entrants
- 1 Change LIFO too FIFI and change new entrant from 3000 to 5000. So instead of having 3 new entrants for 10000 birds, only have 2 new entrants for 10000 birds.
- 1 Change to a deemed assessment or for small sales that support a new producer, allow the assessment to be eliminated. Remove grants, use this to sponsor new entrants or apply grants in a way that does not block the sale of quota assets.
- Could we set up a program for new entrants that after getting initial 3000 quota we would be eligible to buy 2000 more with a 1:1 match by the board to get farm size to 7000. This would make for a viable farm operation
- Drop or reduce the 5% clawback,(don't believe its all needed), speed up the 10/10/10 to 50/50
- Ending LIFO, 10/10/10 would be the most significant changes we could make to improve quota liquidity. Enhancing our new entrant program to encourage expansion would benefit our industry. More and new voices are important, since the rules were changed eliminating the 20000 bird maximum farm size, there has been considerable consolidation in our industry. I believe a strong / expanded new entrant program would help reverse that trend.
- 1 Get rid of the last in first out
- 1 Go back to 10 5 program

- I disagree with quota assessment pools that are married to hold backs of new quotas issued. Ido NOT like policy disagreements linked to quota issuance. Policy should be policy and quota issuance should happen as quickly as possible to ensure our egg market is being filled. Delays in the release of new quotas (essentially a demand for eggs) have put our BC processors at risk to losing out; already eggs are flowing in from other provinces to meet out lack of response to demand. It is a missed opportunity and it does not have to be; BCEMB and BC FIRB policy negotiations should be made outside of quota issuance cycles.
- I want to see another way for people to enter the industry. We are incredibly fortunate to have won through the NPP. Without this, there would be no other way 'in'. The \$10,000 deposit required was crippling to our family and farm. I know there are people out there who love producing eggs who can't grow their production. I believe the industry is missing out on these innovative passionate individuals. There should be a way for someone who demonstrates passion and commitment to the industry to become a part of it.
- I would change the amount of quota a new producer gets. I do agree that it is not a handout and new producers need to work for there spot in the company. On the other hand the amount won is viable if the 10/10/10 is removed. Then a new procurers can get bigger due to the bank being willing to lend against it.
- I would do away with the 10, 10, 10 and implement an assessment which is fair to all parties and as such, makes it possible for people to sell quota without being unfairly penalized.
- 1 I would like to be able to buy or sell direct with anyone willing to buy or sell.
- I would like to change LIFO to FIFO which would have the same effect on new entrant as a mature producers- which i think would create more liquidity in the marketplace.
- I would like to shelf the new entrant program for the time being and focus on growing the large number of small producers. The new entrant program is a good program and can always be pulled off the shelf when needed in the future.
- I would like to shelf the new entrant program for the time being and focus on growing the large number of small producers. The new entrant program is a good program and can always be pulled off the shelf when needed in the future.

- I'd like to see quota transfer assessments eliminated completely, or at the very least moved to a FIFO model with ownership becoming 100% after 10 years. I'd also like to see a target number for new entrants that includes those who have purchased quota. The quota that is reserved for them should come out of allocated growth and should be regulated in order to achieve the target level of new entrants and not exceed it. While it is a good program for the health of our industry, having too many new entrants will burden the industry and make us inefficient. If the target number is 2/year and 2/year are buying quota and entering the industry, than a lottery should not be required. This should be monitored on an ongoing basis and the quota reserves set aside for this program should be capped at a 3-5 year level for 2/year. After this all allocations should be given to current producers to allow for consistent growth to the producers who are helping create a vibrant industry in BC.

 Id like to see more quota on the exchange. Producers who cant produce the increase
- Id like to see more quota on the exchange. Producers who cant produce the increase have a chance to sell at no penalty and be able to purchase a larger amount if they want to expand
- 1 If quota is issued it should be 100% belong to the farm if they can produce it. With no claw backs. Or elimate the 10/10/10 and have a flat 5 % clawback
- If we could set up a program for all new entrants, that after receiving the initial 3000 units of quota we would be eligible to buy up to 2000 more with a 1:1 match by the board, then bringing the flock size to 7000 making it more a viable operation.
- In all honesty, since my name was chosen in the new producer draw, I'm happy now:)
 However if my name was not chosen I think I would feel this; "I wish there was more new producer random draws..."
- It would be great to own more of the quota earlier on in the New Entrant Program.

 Perhaps a matching program could be looked at, where if we are purchasing additional quota it will be matched (1:1) to allow our farm to grow to one which would be more viable. We believe something like this is being done in the broiler sector to encourage growth.
- 1 LIFO to FIFO
- 1 More availability of quota coming for sale
- 1 Nothing
- 1 Remove the 10/10/10 and LIFO A move to FIFO would be some middleground

- Remove the assessments, fund the new entrant program through industry growth, and strongly consider a "New Entrant" as anybody entering the industry for the first time, not just lottery winners. Next generation producers are new entrants, as they bring new life to the industry.
- The board and staff do a really good job helping producers navigate through all the rules. I just wish more quota was available for sale, and transfer assessments are hindering producers from selling.
- The most important thing I believe is to stop the clawbacks. It is common sense that we all know farmers do not like to lose quota to clawbacks. Farmers are very heavily in debt as it is. We have absolutely no subsidies or help from anyone, I say this in a positive way. Farmers take on the huge risk and financial burden themselves so why not give us opportunities to better ourselves financially which in turn benefits everybody else we deal with also.
- We would like to see the assessments reduced or eliminated in certain classes. We would also like to see the egg deficit in BC pursued as soon as possible with EFC.
- Well,maybe no assessments upon transfers and do the new producers out of future growth
- When quota comes to the exchange for sale. No restrictions should be placed on any buyer. The buyer must do his/her research to see if the product he/she is growing is marketable.
- When quota is allocated I think the farmers with a below average size farm should be given a higher percentage of the allocation to provide growth opportunities
- 1 could we set up a program for all new entrants that afyer receiving initial 3000 units of quota we would be eligible to buy up to 2000 more with a 1:1 mach by the board to gey farm size to 7000 to make a more viable operation
- eliminate clawbacks as well as the 5%
- it is good the layer cage should get the same increase as everybody else
- 1 no clawback.. it will stabilize quota prices.. take the new entrant program from industry growth

12. Other Comments?

- 2 No
- As a small farm we would greatly benefit from a higher percentage quota issuance. 3% on 3000 birds is much different than 3% on 100000 birds. If smaller farms were given a greater percentage it would help the little guys to grow.
- 1 CAP PRICE OF QUOTA
- Could more quota be made available on the exchange to farms under 10000 base quota. Current exchange has limited exception for small farms
- Could more quota on the exchange be made to farms under 10,000 base quota. current exchange has limited help for small producers.
- 1 Hurry
- Iguess the only other comment I have is that it has taken far to long to address these problems. They are not new! Meetings were held I believe 3 or so years ago on the mainland, Island and the Interior. Producers and a representative came together to discuss and make a report. Producers came up with many great suggestions on these topics at the time. (The meetings were also available for all to hear as well on the site). All results were then compiled into one report. SO WHY WAS EVERYONE'S SUGGESTIONS NOT LISTENED TO BACK THEN AND ACTED UPON!!!!! What happened to those findings???? Perhaps FIRB should have listened at that time and done something about it. Come to think of it why not try to make things less complicated for everyone involved. You want new people in the industry right... so make it appealing for them. Get rid of the CRAP.....LISTEN to the producers once in a while! Guaranteed there are going to be even more problems coming up in the future. Such as when c

- I have begun to wonder if quota allocations can be conducted differently. It is a constant challenge to manage the growth. We built a big barn that cost us lots of money, in order to finance it and increase our cash flow, we needed to maximize our barn space. So we purchased more quota. Our new barn now is maxed out. With the next allocation, we are looking at more creative ways to house chickens, including retro-fitting our old smaller barn. It seems that everyone in the industry struggles with this one way or another. Many have had to give up their allocations as they simply cannot be placed. I believe they should see some financial return. As egg production is more of a life-long career, I wonder if there is another way to evaluate quota allocations. It would be nice if producers could express if they wish to grow their production or maintain their production and quota would be allocated according to need. A model like this would have to be more consistent, and be able to more ac
- I see FIRB as more of an hinderance then being helpful. They are out of touch with the industry and majority of members never farmed. Ontario without a FIRB are far more advanced then us so we should disban FIRB and save the taxpayers lots of wasted money on salaries
- 1 I would like to see more quota on exchange be made available to farms that are under 10000 base quota .Current exchange has limited help for small farms ...
- If more quota was available for winning new producers to buy right after the draw they could greatly help the industry. Example if a new producer won 3,000 units then before start date they each got a chance to buy an addictional 3,000 units
- LIFO last in first out FIFO first in first out rather than new entrants at 3000 birds maybe put new entrants at 5000 birds each and start up a few less. maybe cap quota at a certain price not going up after each exchange.
- 1 More restrictions on quota transfers equals less quota on the market equals higher prices. Lower prices would foster new producers into the industry which is better for the long term health of the industry.
- 1 Not at this point
- One other comment I would like to make is change the NPP 3000 allotment to 5000 birds to make it more viable. an example 15000 birds would allow for 3 new producer instead of 5 new producers.
- Our supply managed industry is a privilege that seems to be constantly under threat, not only from outside, but also from within. If we can find ways to improve it and making it more inclusive, we will all benefit in the long run.

- 1 Please share survey findings and themes back to those who participated. Also what recommendations come from this.
- Thank you for the opportunity to provide input on this process. We will be very interested to see results and hear input from long time, experienced producers in the industry. As new producers we have received an amazing amount of information and help from existing producers new and old. It has been a very welcoming industry and we are excited to be part of making it stronger!
- The board should be putting policies in place which are beneficial to people who want to enter the industry and people who are in the industry. The board has no obligation to those who want to exit the industry
- The length of time for producers to receive allocation in response to market growth has exacerbated the problem by making quota more in demand.

QUOTA ASSESSMENT TOOLS CONSULTATION

BC Egg Marketing Board

Consultation #1 Level 2: Cross Tabulation of Survey Reponses Based on Variables

1. Have transfer assessments limited the transfer of quota, if so, to what extent?		
LM – Top 25%	1 – No	
	8 – Yes, Significantly	
LM – Middle 50%	10 – Yes	
	5 – No	
	1 – Not sure	
LM – Bottom 25%	4 – Yes	
	4 – Not sure	
INT – Top 25%		
INT – Middle 50%	1 – Yes, Significantly	
INT – Bottom 25%	6 – Yes	
	1 – No	
	1 – No answer	
VI – Top 25%	1 - No	
VI – Middle 50%	2 - Absolutely	
VI – Bottom 25%		

2.	Do you think limited transfer assessments are contributing to increases in the price of quota?	
a.	LM – Top 25%	9 - Yes
b.	LM – Middle 50%	15 - yes 1 - no
C.	LM – Bottom 25%	5 – Yes, limited supply increases cost 1 – No 2 – Not Sure
d.	INT – Top 25%	
e.	INT – Middle 50%	1 - Yes, limited supply increases cost
f.	INT – Bottom 25%	6 – yes 1 – Not assessments – its just a attractive industry 1 – no comment
g.	VI – Top 25%	1 - Yes
h.	VI – Middle 50%	2 – Yes, supply is limited
i.	VI – Bottom 25%	

3.	Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?	
a.	LM – Top 25%	 5 – Not sure 2 – No difference 2 – Yes by treating everyone the same you are actually penalizing long time producers that are clearly not looking for "windfall gains"
b.	LM – Middle 50%	1 – Speciality producers were unable t purchase on last exchange 1 – Remove NPP and allow set aside quota to be purchased by new entrants 2 – hard for new entrants to burrow money with 10/10/10 10 – everyone treated same 1 – Production type is irrelevant, every individual is affected differently
c.	LM – Bottom 25%	1 – Yes, Long Term Producers are hindered from growth3 – Hard to expand as new entrant4 – Not sure
d.	INT – Top 25%	
e.	INT – Middle 50%	1 – need better incentive for NPP, should remove 10/10/10 on this class and tie quota to property so the new entrant and burrow against the quota
f.	INT – Bottom 25%	6 – Yes, hard to lend from bank 2 – Hard to become viable, clawbacks to create more inefficient farm sizes is a frustration 1 – No comment
g.	VI – Top 25%	1 - Yes
h.	VI – Middle 50%	1 – No comment 1 – I don't think so
i.	VI – Bottom 25%	

4. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

could further reduce barriers to entry and increase quota availability?	
LM – Top 25%	1 – No 5 – remove 10/10/10 and LIFO 6 – Change LIFO to FIFO 1 – 50/2/5
LM – Middle 50% LM – Bottom 25%	3 – End NPP program will create more fluidity in market 1 – no 1 – deemed assessments 1 – 20/20/5 with FIFO 2 – FIFO 1 – No assessments 6 – end LIFO 1 – Remove 10/10/10 – Make policy simple 1 – if you cannot accept u lose it immediately
LIVI – BOTTOM 25%	1 – If you cannot accept a lose it immediately 1 – remove 10/10/10 1 – remove all assessments 5 – not sure
INT – Top 25%	
INT – Middle 50%	1 – Remove LIFO and 10/10/10, allow new entrants to buy and additional 3000, use funds to lower levies for all producers, better for new entrant and better for industry
INT – Bottom 25%	 1 – Remove LIFO and 10/10/10 1 – New entrant need to prove themselves 1 – why are we assessing when the market is short on product 1 – No comment
VI – Top 25%	1 - Availability is not an issue
VI – Middle 50%	1 – Remove LIFO and 10/10/10 – You had no problem taking my quota when there were decreases 1 – Change LIFO to FIFO and 20/20/5 for quicker equity gains for burrowing
VI – Bottom 25%	

5. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?	
LM – Top 25%	8 - Quota exchange is new1 – Recently purchased a going concern
LM – Middle 50%	Quota exchange, NPP, Exempt Transfer, whole farm purchase
LM – Bottom 25%	Difficult to enter; more liquidity would make it easier to enter industry
INT – Top 25%	
INT – Middle 50%	1 – backyards without quota are a continued issue, successful NPP could mitigate issue
INT – Bottom 25%	 1 – Before NPP tried whole farm purchase twice but the quota lost made sale unaffordable 3 - no comment 3 – No 1 – Everything I know is from NPP program
VI – Top 25%	1 – Coming from other SM commodities
VI – Middle 50%	2 – Some are buying on exchange
VI – Bottom 25%	

6. Are whole farm transfers still important for succession or industry health?	
LM – Top 25%	9 – Yes, essential
LM – Middle 50%	16 - Yes
LM – Bottom 25%	5 – Yes
	3 – Not sure
INT – Top 25%	
INT – Middle 50%	1 - Yes
INT – Bottom 25%	7 – Yes
	1 – No comment
VI – Top 25%	1 - Yes
VI – Middle 50%	2 - Yes
VI – Bottom 25%	

7. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

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LM – Top 25%	2 – not as important as family
	1 – unsure
	6 - Yes
LM – Middle 50%	7 – Yes
	1 – Eliminating assessments makes more access for everyone
	8 – no comment
LM – Bottom 25%	1 – Yes it gives flexibility in succession planning
	7 – not sure
INT – Top 25%	
INT – Middle 50%	1 – Yes and allow upward movement of quota
INT – Bottom 25%	5 – Yes
	3 – Not sure
VI – Top 25%	1 – N/A
VI – Middle 50%	2 – Yes and allow upward movement of quota
VI – Bottom 25%	

8. Have you transferred quota between 2005 and now?	
LM – Top 25%	2 – No
	1 – No, still waiting
	6 – Yes
LM – Middle 50%	7 - Yes
	9 - No
LM – Bottom 25%	2 – No but have been trying to purchase
	6 – No
INT – Top 25%	
INT – Middle 50%	1 – Yes sold in 2005
INT – Bottom 25%	8 - No
VI – Top 25%	1 - Yes
VI – Middle 50%	2 - Yes
VI – Bottom 25%	

9. How have quota assessment tools affected you? Tell us your story.	
LM – Top 25%	5 – Negatively affected 1 – Extremely negative effect 3 – Not affected yet
LM – Middle 50%	11 – Negatively affect 3 – unaffected 2 – No Answer
LM – Bottom 25%	 1 – because of assessments I am able to start my dream 1 – cant sell quota because of the financial consequences 1 – assessments limit transfer 5 - nothing
INT – Top 25%	
INT – Middle 50%	1 – Had to sell due to unforeseen financial need, got penalized bigtime
INT – Bottom 25%	7 – Negatively affected – cannot get equity to burrow and grow 1 – No comment
VI – Top 25%	1 – Not affected yet but will be problem with current rules
VI – Middle 50%	2 – Negatively affected
VI – Bottom 25%	

LM – Top 25%	would you like to change? Caged should get same increases as others
LIVI 10p 25/0	Eliminate all assessments including 5%
	Reduce 5% and change to 50/50
	Remove LIFO and make FIFO
	Start less NPP with 5,000 lots
	Count new entrants on Exchange and New Producers, 100%
	ownership after 10 years
	BC is only province with assessments. Remove LIFO and 10/10/10
	Make changes retroactive
LM – Middle 50%	Remove LIFO
imadic 30%	Remove LIFO & 10/10/10
	Remove Exchange and Allow private sales
	No clawbacks
	Limit \$ value increase on exchange
	End new entrant program
	Quota assessment pools should not be linked to new quota, the
	industry and consumer suffer. Negotiations regarding policy
	decisions should occur outside issuance cycles.
LM – Bottom 25%	1 – Shelve NPP draw and focus on making current entrants more
	viable with more quota
	2 – More quota on exchange
	1 – Remove assessments
	1 – Nothing
	1 – Happy name is chosen but if name wasn't would be wishing
	for more draws
	2 – No comments
INT – Top 25%	
INT – Middle 50%	1 – enhance NPP program , make it more viable; remove LIFO and 10/10/10
INT – Bottom 25%	1 – either issue NPP more quota or remove 10/10/10 so they can
	lend on it
	1 – go back to 10/5 program
	1 – Reduce or eliminate assessments
	1 – No comment
	4 – Match 1:1 quota purchased up to 7,000 to make more viable
	NPP program
VI – Top 25%	1 – Eliminate 10/10/10 and have flat 5% clawback
VI – Middle 50%	1 – Change LIFO to FIFO, remove 10/10/10 on established
	industry, Stop charging EFP to producers not utilizing birds, now
	that unengaged producers are removed from industry reinstate
	program
	1 – Change LIFO to FIFO
VI – Bottom 25%	

11.Other Comments?	
LM – Top 25%	1 – hurry up 1 – cap price of quota 1 – start NPP at 5,000 with less people (different person) 3 – None at this time 3 – This is a business and for 40 years when consumption decreased there was no hesitation to take quota away. Why penalize farmers when their risk is rewarded.
LM – Middle 50%	1 – Please share survey themes 15 – None at this time
LM – Bottom 25%	1 – FIRB is a hindrance1 – board policies should help entrants, no obligation is owed to the seller
INT – Top 25%	
INT – Middle 50%	1 – Making supply management more inclusive is important for industry help
INT – Bottom 25%	 1 – restrictions restrict quota movement 1 – allow NPP winners opportunity to buy 3000 more quota before startup 2 – No comment 3 – make more quota available on exchange with priority to producers <10,000 quota 1- Allocate more quota to smaller farms
VI – Top 25%	
VI – Middle 50%	 1 – stop ignoring the farmers, supply management can be good, you are making it difficult 1 – Change to FIFO and start less new entrants at 5,000 lots
VI – Bottom 25%	

QUOTA ASSESSMENT TOOLS CONSULTATION

Consultation #1 Level 3: Individual Responses BC Egg Marketing Board

Response ID:4; vxAexVc3ybq8F0p0dq Data

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Organic

- 2. Have transfer assessments limited the transfer of quota, if so, to what extent?
- 3. Do you think limited transfer assessments are contributing to increases in the price of quota?
- 4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?
- 5. Are there changes to quota transfer assessments or other tools- that could further reduce barriers to entry and increase quota availability?
- 6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?
- 7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?
- 8. Are whole farm transfers still important for succession or industry health?
- 10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?
- 11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?
- 12. How have quota assessment tools affected you? Tell us your story.
- 13. What, if anything, would you like to change?
- 14. Other Comments?

Response ID:5; gwzQqDc16YqVtygyV3 Data

1. (untitled)

Quota Holdings

Top 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Caged

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

no

 ${\bf 3. \ Do\ you\ think\ limited\ transfer\ assessments\ are\ contributing\ to\ increases\ in\ the\ price\ of\ quota?}$

yes

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

no

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

no

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

buy quota like everybody else

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

notes

8. Are whole farm transfers still important for succession or industry health?

yes

10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

yes

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

no

12. How have quota assessment tools affected you? Tell us your story.

no

13. What, if anything, would you like to change?

it is good the layer cage should get the same increase as everybody else

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Caged

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Not in our case, we have not sold or bought quota, only complete farms many years ago

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

I believe that specialty producers should not be assessed the claw back, because the processors are short of organic product, nobody wants to produce this product; then take a lesson from the dairy industry who issue permits for more production as needed, to whoever can grow and produce the product required, like organic

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

No ideas

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Don't know, but new entrants can certainly buy the necessary quota to participate in the industry, as evidenced recently.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

No, don't think so, there should be room for manager/ operators to become owners of farms without severe clawback issues. Some of these guys have operated farms on behalf of owners for a number of years, and that needs to be taken into consideration, including tax laws and other severe obstacles, which are very restrictive. If we want to keep these guys farming, give them a reason, not an obstacle course!

8. Are whole farm transfers still important for succession or industry health?

Yes absolutely!!

10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Yes, non family succession plans are very important! There needs to be a mechanism in place that does not punish a new/manager producer, and does not place an undue tax burden on them, more of a tax issue probably

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks

occurred)?

Мо

12. How have quota assessment tools affected you? Tell us your story.

Have not at all

13. What, if anything, would you like to change?

????

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Caged

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

No, not for me

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

Yes, new entrants benefit from the assessments

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Yes, if we eliminate the last in first out more quota will become available

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Not sure

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

Yes there are changes. Many farms are companies and farms are so expensive that kids can't afford to buy them outright so creative succession plans have developed

8. Are whole farm transfers still important for succession or industry health?

Yes

10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Don't know

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No

12. How have quota assessment tools affected you? Tell us your story.

If the last in first out had not been there I may have sold some quota rather than renovate a barn

13. What, if anything, would you like to change?

Get rid of the last in first out

Response ID:8; XQNIkEh2bDzxtKRKAy Data

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Free Run

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes. If the farmer wants to reduce the size of his farm he gets penalized while his downsizing can enable a new producer to start and a smaller producer to grow

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

I think market conditions determine price. If there was an abundant perhaps the price will decrease. Transfer assessments stop the flow of liquid quota by penalizing the producer

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

I am a new entrant. I knew full well of the rules when I started so I accept that. A conventional farm that has been in the industry for 15 plus years is greatly hindered of selling an quota because of the claw back

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Yes. we can have any increases not able to be produce to be put on the exchange. we shouldnt hold it for 3 years for a producer. If he cant produce it put it on the exchange or back in the pool for producers who can produce it

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

If there was more liquid quota available there would be more new farmers. On the last quota exchanges more new farmers started then required from the new entrant program. If we take the quota units on make them available on the exchange we wont need that program. Plus if there was more quota transfers of a lesser clawback there would be also more quota units available

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

I started farming for my kids. Farms and family go hand in hand, we should encourage not hinder family succession.

No family direct family member should be penalized for taking over the family farm.

This is the backbone for farming

8. Are whole farm transfers still important for succession or industry health?

Yes. to make it viable for succession we need to have whole farm transfers to imediate family members at no penalty

10. Are non-family succession structures important for industry success going forward? If so, are there 154

related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

i am unaware of this situation. I am saying stop penalizing the right for a farmer to transfer one bird of quota or the whole farm. Its a tax.

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No I am purchasing quota to grow

12. How have quota assessment tools affected you? Tell us your story.

I wont be able to sell quota to help my farm. The penalties are a kick in the ball. No other body has these type of restrictions. Not since the days of Stalin is someone trying to depress the growth of an industry. Need to question the true intent and role FIRB plays in our industry. FIRB is anti farming. They just dont get it

13. What, if anything, would you like to change?

Id like to see more quota on the exchange. Producers who cant produce the increase have a chance to sell at no penalty and be able to purchase a larger amount if they want to expand

14. Other Comments?

I see FIRB as more of an hinderance then being helpful. They are out of touch with the industry and majority of members never farmed. Ontario without a FIRB are far more advanced then us so we should disban FIRB and save the taxpayers lots of wasted money on salaries

Response ID:9; 54JD8EI5Z3BrH2g2En Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Caged

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

no

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

no

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

no

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

no

- 6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?
- 7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?
- 8. Are whole farm transfers still important for succession or industry health?

yes

- 10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?
- 11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

no

12. How have quota assessment tools affected you? Tell us your story.

We have had to do some renovations, but with assessment we have been getting, it more or less evens out with the cost of these renovations

- 13. What, if anything, would you like to change?
- 14. Other Comments?

Response ID:10; 8g4nLgs9Jgq2fM1M6r Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Free Range

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes. They limit farmers selling quota because they lose so much quota to assessments.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes

- 4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?
- 5. Are there changes to quota transfer assessments or other tools- that could further reduce barriers to entry and increase quota availability?
- 6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?
- 7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?
- 8. Are whole farm transfers still important for succession or industry health?
- 10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?
- 11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?
- 12. How have quota assessment tools affected you? Tell us your story.
- 13. What, if anything, would you like to change?
- 14. Other Comments?

Response ID:11; BVM7r5hJkPANslzl89 Data

1. (untitled)

Quota Holdings

Top 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Mixed Conventional & Specialty

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

yes. significantly

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

yes, creates an artificial shortage

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

nc

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

5% clawback on farm and quota sales

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

purchasing farms, quota exchange

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

yes, more children of farmers entering the business

8. Are whole farm transfers still important for succession or industry health?

ves

10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

not as important as in family

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

yes purchased on quota exchange

12. How have quota assessment tools affected you? Tell us your story.

hasn't yet but will affect in future

13. What, if anything, would you like to change?

eliminate clawbacks as well as the 5%

Response ID:12; M4velGsx5IO0tXkX4D Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Caged

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

yes... when you review the fact that every quota acution has been oversubscribed.... the clawed back quota during a transfer would in most cases be sold to the purchasing producer along with the original larger sale and thus the production be utilized much sooner than when the quota is raffled off

- 3. Do you think limited transfer assessments are contributing to increases in the price of quota?

 absolutely... limited access means higher prices.... its called "supply and demand".... also farmers that sell want to be paid for their entire quota therefore increase the asking price to cover the clawback
- 4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

less access to quota means higher quota prices... higher quota prices means more cost for a new producer to expand by purchase than it does an existing producer

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

more fluidity means lower quota prices.. thats a lower barrier.. continue with the lottery from quota increases only opposed to clawback.. other than that... I dont understand the obsession with "new entrants"

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Urbanization creates misunderstanfing of the farm life... people dont grow up wanting to be farmers unless they are raised on the farm... your new entrants,,, if you want to call them that will 95% come from within

- 7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?
- 8. Are whole farm transfers still important for succession or industry health?

100%

- 10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?
- 11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

no

12. How have quota assessment tools affected you? Tell us your story.

ive purchased at higher prices because sellers want to make up for the clawback

13. What, if anything, would you like to change?

no clawback.. it will stabilize quota prices.. take the new entrant program from industry growth

Response ID:13; b7b47eC28Rk6tKJKO8 Data

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Free Run

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes, definitely There is barely any quota available for transfer because nobody wants to lose all their allotments because of the 10,10,10 assessment.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes, if there was more quota available the price would possibly be lower. As anywhere else, it is supply and demand. Very limited supply: price goes up.

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

Yes. It all depends what is available

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Yes. If you would away with the 10, 10, 10 and put another fair transfer assessment in place to all different commodities, there would be more quota available for new entrants to access and start a financially feasible production unit

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Unless the parents give the farm to their children or win the lottery there are no other ways but buying some existing producer out in order to start farming.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

Yes. It is going to be more and more large enterprises which are not family farms anymore. If people cannot get started in the industry because they cannot access quota the family farm will disappear.

8. Are whole farm transfers still important for succession or industry health?

Yes and no. The egg board should implement what the milk board does: half of the quota goes with the sale of the farm and half of the quota goes on the exchange so that not one person can scoop up all the quota

10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Don't know

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No We have been trying for the last two years to access quota

12. How have quota assessment tools affected you? Tell us your story.

Nobody is willing to sell because of the assessment, so, as a new producer, I cannot even buy quota to get into the industry

13. What, if anything, would you like to change?

I would do away with the 10, 10, 10 and implement an assessment which is fair to all parties and as such, makes it possible for people to sell quota without being unfairly penalized.

14. Other Comments?

The board should be putting policies in place which are beneficial to people who want to enter the industry and people who are in the industry. The board has no obligation to those who want to exit the industry

Response ID:14; 02v823cnZkO9lwrw50 Data

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Free Run

- 2. Have transfer assessments limited the transfer of quota, if so, to what extent?
- 3. Do you think limited transfer assessments are contributing to increases in the price of quota?
- 4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?
- 5. Are there changes to quota transfer assessments or other tools- that could further reduce barriers to entry and increase quota availability?
- 6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?
- 7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?
- 8. Are whole farm transfers still important for succession or industry health?
- 10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?
- 11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?
- 12. How have quota assessment tools affected you? Tell us your story.
- 13. What, if anything, would you like to change?
- 14. Other Comments?

Response ID:15; gwzQq8i16YqVtygyMr Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Caged

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

I don't know

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Quota has always had inflated prices since day 1. My opinion is that as long as there is stability in the industry with COP pricing, quota will always remain a sound investment. And it's supply and demand that should determine quota pricing.

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

I do not know.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

I personally am of the opinion that with our system we all should pay for quota. I realize the government wants to impose new entrants policies on us. We have spent many years purchasing and paying for quota and this business should be treated like any other good business. It costs money to make money. We have 2 sons who got into the egg industry by making all the right investments to be able to farm. No freebies in our family.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

I don't know, other than inherited farms, family's working together, outright purchasing farms, free quotas from draws. Integration etc.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

I don't know.

8. Are whole farm transfers still important for succession or industry health?

Yes

10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

I don't know

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

Yes, I was a shareholder with my siblings and sold our shares to my sons.

12. How have quota assessment tools affected you? Tell us your story.

No problem, as it was a transfer of shares.

13. What, if anything, would you like to change?

I would like to be able to buy or sell direct with anyone willing to buy or sell.

14. Other Comments?

No

Response ID:16; xzpMzJs9NQwXfMeMdR Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Mixed Conventional & Specialty

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes, there is a reluctance to trade quota due to the inherent clawbacks.

Very prevalent, as the clawboks cause extreme hardships

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Absolutely, when you limit supply due to clawback rules, the demand curve results in a higher price due to the reduced limited supply

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

As a recent new entrant, we purchased a nominal amount of quota. Had more been a viable, we would have purchased more. Perhaps if the environment was a bit more liquid, we would not require "free" new entrant draws and that allotment could be set aside for new entrants to purchase. This would be much more fair and transparent than picking winners and losers

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

THe 10% holdback of new entrants could be sold ...that way any new entrants can get in if they wish

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Via purchasing quota off of the exchange

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

Transitional thinking and approach is that quota would move down to children.

The new trends are that succession may actually be a sibling to sibling transfer, but seeing there is no exemption, these transactions are being deferred, which stifles change. Also one can envision reverse transactions up the chain. I.e. A farm succession to kids may revert back to the parent and have a clawback trigger in due to either a child death, sickness, or marital issues. Due to these risks of a one way exemption only, parents are not a s prepared to engage any succession plans too early as the risks and costs could be to great if the farm comes back to the parent.

8. Are whole farm transfers still important for succession or industry health?

Absolutely!

10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

Yes

12. How have quota assessment tools affected you? Tell us your story.

We had an agreement for sale with a farmer who was retiring prior to any clawbacks came in to place. We leased his quota and rented barns to house their quota and build up capital to purchase the quota as per our agreement. Then the rules changed and due to the clawbacks and the forced quota exchange....this fettered our deal and was too costly for either party to conclude any arrangement. As a result we leased the quota another 10 years as he and others held fast. HAd the rules not of changed they would have sold 10 years earlier. It served the seller well, but not the purchaser as we invested time and money and at the end of the day had to pay much more for only a small portion of that quota when it finally was let go and went on the exchange .

True story!....amongst other 2-3 cases that we were made aware of.

13. What, if anything, would you like to change?

Remove the 10/10/10 and LIFO A move to FIFO would be some middleground

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Free Run

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes. To the extent that it inhibits our ability to plan for the future.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

Yes it does impact new entrants differently. When we entered the program 13 years ago it was 10 + 5% and now it has change to 30% for us.

Less quota on the market promotes higher prices.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Yes. Lower the clawback to the original program.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

We don't understand this question.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

How would we know if there are changes to family farm succession?

8. Are whole farm transfers still important for succession or industry health?

Yes, they are still important.

10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Yes.

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No.

12. How have quota assessment tools affected you? Tell us your story.

They have affected us because they have changed our future plans.

13. What, if anything, would you like to change?

Go back to 10 5 program

14. Other Comments?

More restrictions on quota transfers equals less quota on the market equals higher prices.

Lower prices would foster new producers into the industry which is better for the long term health of the industry.

Response ID:18; M4ve4Gux5IO0tXkX4D Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Free Run

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Probably not, but when it started it effected the price

- 3. Do you think limited transfer assessments are contributing to increases in the price of quota?

 ves
- 4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

New entrants ,if drawn names,directly get the assessment quota. If they are just new producers who bought in,then everyone is the same when it comes to selling. all new growth for all is assessed the same way I believe?

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Well the 10-10 or first in out thing will effect. If an old producer could sell "old" quota and free up space for new, there might be more shake loose. Probably too late now, everyone has expanded?

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Well ,the new exchange allows anyone to buy quota if they really want. It just limits the amount we can buy which may effect cash flow for new guys.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

Well the family farm is now a bit bigger. The guys involving their kids now, are mostly bigger quota holders. They expanded to bring in the crew.

8. Are whole farm transfers still important for succession or industry health?

Well that would be nice if there were some whole farms transfer, but most are large in price and are now for the big guys only

10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Well if the larger farms could scale down in size for family transition, it would be easier for new generation without penalizing the old

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

Not in table egg, but in others yes

12. How have quota assessment tools affected you? Tell us your story.

Well it will change the number to sell, but has raised the price of the quotas when it first started

13. What, if anything, would you like to change?

Well, maybe no assessments upon transfers and do the new producers out of future growth

Response ID:19; 71ORmYivD8BMSRxRBJ Data

1. (untitled)

Quota Holdings

Top 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Caged

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

No one wants to lose such a large amount of their quota in order to downsize, finance equipment changes or exit the industry. Furthermore, in a whole farm sale the efficiency of the barn is reduced as it is no longer running at it's capacity or at least it's previous capacity.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

The price of quota is affected by the very small percentage that sells. Reducing or eliminating transfer assessments should increase the supply. Also, it may reduce the urge of a seller to try and make up for the lost quota in the price of what he has left to sell.

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

Not sure

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Reducing, eliminating and speeding up the 10/10/10 to 50/50 will make more quota available. Making it retroactive for past issuances will make more available even faster.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

When I bought my farm many years ago most of the farmers were older than me and now most are much younger. Not all are family transfers, so people find ways to do it. It wasn't easy to finance when I started and it's not easy now, but then it's not easy to buy a house either.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

Not sure

8. Are whole farm transfers still important for succession or industry health?

Yes to both succession and industry health. Otherwise farmers would try and stay on until their barns and equipment is worn out or obsolete. Whole farm transfers lets new farmers take over with immediate cash flow and they're more likely to modernize facilities than would older farmers waiting to exit.

- 10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?
- 11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No

12. How have quota assessment tools affected you? Tell us your story.

I am past retirement age and do not have family to take over, we are faced with having to change cage systems in the future, even though our barn and equipment has many more useful years left. After 45 years in this industry I do not want to write off quota that I have accumulated as well as not get any realistic value for soon to be outdated barns. When the assessments are reduced or eliminated we will sell. Furthermore, the CRA has decided to take a larger share of quota sale returns, making the matter that much harder to accept.

13. What, if anything, would you like to change?

Drop or reduce the 5% clawback,(don't believe its all needed), speed up the 10/10/10 to 50/50

14. Other Comments?

Hurry

Response ID:20; ylyP00c1AGxEtO0Ok8 Data

1. (untitled)

Quota Holdings

Top 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Caged

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes.

The LIFO and the 10-10-10 rules have prevented producers to put quota on the market, There are prod that would have sold some quota to finance retooling, but because of the claw back have not done so.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes. LIFO and the 10-10-10 rule has done just that.

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

Yes the 10-10-10 rule is the same for all. LIFO effects specialty and conventional producers in a way that part of the quota would be clawed back if they sold part to finance retooling.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Yes change LIFO to FIFO

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

There are people wanting to enter the industry by buying 5000 to 10000 birds not true NPP

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

Split Fam farm between children and farm manager / worker

8. Are whole farm transfers still important for succession or industry health?

Yes

10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

I would like to think so. I would think the transfer assessment exemptions should be the same, but a rule could be in place that would hinder the new producer selling without triggering the assessments.

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

Yes.

12. How have quota assessment tools affected you? Tell us your story.

sold majority shares in two farms to children where there where no assessments taken.

13. What, if anything, would you like to change?

LIFO to FIFO

14. Other Comments?

One other comment I would like to make is change the NPP 3000 allotment to 5000 birds to make it more viable. an example 15000 birds would allow for 3 new producer instead of 5 new producers.

Response ID:21; 71 OR8 PTv D8 BMSRx RBJ Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Free Run

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes. We are limited to the amount we are able to buy

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

The only restriction on the last exchange was the inability for free run/range to purchase quota. The producers responded overwhelmingly to take birds out of cages and now they are restricted in growth, which they need to help pay for the investments they were encourage by the board to make.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

At this point I feel FIRB wants a handle on the movement of quota and the approach seems to work, other than it drives the price of quota up to quickly. I feel there should only be one increase a year at the very most.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

The fairest way is for them to buy into the system, as most of us have done. Regardless if you want to farm in the layer industry you need money to start up. I feel some folks think this is a free lottery to become wealthy in. It is not. It is to encourage new farmers to the industry.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

I feel there is not a great deal of change. If someone in the family is interested they will make arrangements to continue the family farm. If not it will be sold ..

8. Are whole farm transfers still important for succession or industry health?

Yes.

10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Yes. As there are farmers without children or family heirs, some may wish to leave it to their managers. I feel this should be treated as if a family member/ child received the farm. There should be no claw backs in a case like this. Scrutiny should be done in cases like this. ie timelines of service to the farm.

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No. I have purchased quota.

12. How have quota assessment tools affected you? Tell us your story.

The only negative that has happened, is that we are restricted in purchasing quota because of the type of birds we have. I understand the market place has enough of a certain product, but the board must accept some responsibility for this as we were all encouraged to go cage free. The market will determine what it wants to buy. I feel the board should not determine what the market wants and the producer carries all the financial responsibility.

13. What, if anything, would you like to change?

When quota comes to the exchange for sale. No restrictions should be placed on any buyer. The buyer must do his/her research to see if the product he/she is growing is marketable.

14. Other Comments?

Not at this point

Response ID:22; ZQkvyQUBdrGzhl4lzK Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Free Range

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes they have. The last in first out is keeping farmers from selling a bit or all of their quota due to losing so much to assessments.

- 3. Do you think limited transfer assessments are contributing to increases in the price of quota? Yes, most definitely.
- 4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

They impact everybody because there is not enough quota going on exchanges because farmers don't want to lose so much to clawbacks. In turn this is driving up the price of quota.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Bring in FIFO (first in first out). There has been lots of new entrants picked now so there is no need for any clawbacks.

- 6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?
- 7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?
- 8. Are whole farm transfers still important for succession or industry health?

Yes. It is important for lots of farming families that the transfer of quota to children who want to continue farming be in their best interest. If not the farm and quota get sold, usually to another farmer, which goes against wanting more new people in the industry.

- 10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?
- 11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

Yes I have.

12. How have quota assessment tools affected you? Tell us your story.

I sold dairy quota in 2008 and bought layer quota. I lost 5% to clawback when I sold the dairy quota. Yes of course it would have helped us financially if I didn't lose 5% of the dairy quota to clawbacks. Everything we do goes back into the farm so we can stay sustainable and hopefully help our children take over and continue farming.

13. What, if anything, would you like to change?

The most important thing I believe is to stop the clawbacks. It is common sense that we all know farmers do not like to lose quota to clawbacks. Farmers are very heavily in debt as it is. We have absolutely no subsidies or help from anyone, I say this in a positive way. Farmers take on the huge risk and financial burden themselves so why not give us opportunities to better ourselves financially which in turn benefits everybody else we deal with also.

Response ID:23; qPONqvH2Lde3tX3XKE Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Caged

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Absolutely! The proof obviously is the amount of quota put up for sale. I am sure there would have been a lot more available to purchasers if the LIFO policy did not exist. Earlier sales or transfers were due to leasing policy changes and new legislation in regards to capital gains. The assessments have caused a lot of producers to hold back on any quota transfers. I am positive that more quota would become available if the LIFO policy disappeared.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes. With this present system in place. Remove the LIFO and I am sure quota will begin to move. I myself would have found that much better than having gone through the penalties of the quota assessment policies. I know other producers would release some quota if they weren't penalized by the policy.

- 4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?
- 5. Are there changes to quota transfer assessments or other tools- that could further reduce barriers to entry and increase quota availability?

Remove the LIFO policy completely!!!! Why in the world was it ever created (and with not much forethought I might add). Also the 10/10/10 rule should be removed. Another stumbling block for producers. I understand how it could work for new entrants to stop them from just turning around and quickly selling the quota to make a fast dollar, but I believe that producers who are already committed to their farms should not be penalized more than the 5% they already are. Have new producers fall under the 10/10/10 rule to show their commitment perhaps?? Here's a question to you.....if the market changes for whatever reason and demand falls and quota must be cut (and that has happened in the past) is the 10/10/10 rule going to apply to quota cuts as well???? I doubt it! And let's not forget the amount of extra paperwork and time being spent on these assessments/policies!

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

I do not know of other ways for new entrants to enter. For them to go out and just purchase the quota is difficult enough when banks are hesitant to lend when they have no quota to start. The new entrant program can work as long as there is quota available for them. Perhaps when quota is allocated to the province a portion of that should be set aside for new entrants.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

There is always change in succession. Traditional is becoming a thing of the past it seems. There are becoming so many more dynamics regarding the family farm coming into play. As it sits now transitions are not allowed to revert back in the family without the quota transfer assessments coming into play. This

180

seems very harsh when you consider family farms. Why should a parent be penalized if they are trying to save the family farm from situations that arise from children...ie...falling out between brothers and sisters, financial reasons, or divorce etc.

8. Are whole farm transfers still important for succession or industry health?

Yes

10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

I believe that for some it is important to go forward in their situation. What if the child or children in the family died? What if you had a farm manager that you would like to enter or take over your business? Myself I can't really answer what tools would support this approach to succession, but I am sure ideas will be brought up on this question by others.

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

Yes

12. How have quota assessment tools affected you? Tell us your story.

They have hit me very hard. I have just recently and reluctantly placed quota for sale. My situation is that I do not have the room to utilize the quota that I have been allocated. I did retrofit an existing shed/barn on my property to house the allotments from 2009/10. The most recent allocations which totalled 11.2 % I have not been able to utilize. With the removal of the ability for the producer to lease their quota, I have no choice other than to sell quota.

Of course I could also build a new barn/s.

Unfortunately my situation at this moment in my life is that I am not sure which way my child wants to go as he is still to young. If I build now I would not see my return on investment for many years to come. For me I would be at retirement age by the time my farm restructuring was paid back. The idea of selling my land is at this moment out of the question. So this only leaves me to sell quota (since I don't have the space to house, and can't lease) which could assist me in having the capital to build a newer facility if I choose.

So for the last two years I have been figuring out how to go about all of this. So after much discussion and thought, my plan was to list quota on the Mar +Sept exchange. Sept will be stage 2 of my plan. (March and Sept are my end of flock dates) Of course yet again I will be again screwed out of the most recent allocation announced on April 5th of this year. It just gets better and better for me -- doesn't it!!!

13. What, if anything, would you like to change?

- -Remove the LIFO and change to FIFO (personally quota should be quota...don't start or continue creating specialized quota. We all know what happens when certain things become specialized....it creates problems!!!)
- -Remove the 10/10/10 rule for established producers in the industry (Apply to new entrants only)?
- -Remove the Service Fee/Levy on the EFP portion of Quota if the producer is not able to Utilize the allocated quota for that program. I have been paying and don't even have the birds placed (and are unable) to produce such product....highly unfair!
- -Perhaps bring back leasing to producers with utilization problems. Now that the producers who were just leasing and not producing have been removed maybe it should be reinstated??

14. Other Comments?

I guess the only other comment I have is that it has taken far to long to address these problems. They are

not new! Meetings were held I believe 3 or so years ago on the mainland, Island and the Interior. Producers and a representative came together to discuss and make a report. Producers came up with many great suggestions on these topics at the time. (The meetings were also available for all to hear as well on the site). All results were then compiled into one report. SO WHY WAS EVERYONE'S SUGGESTIONS NOT LISTENED TO BACK THEN AND ACTED UPON!!!!! What happened to those findings????

Perhaps FIRB should have listened at that time and done something about it.

Come to think of it why not try to make things less complicated for everyone involved. You want new people in the industry right... so make it appealing for them. Get rid of the CRAP.....LISTEN to the producers once in a while!

Guaranteed there are going to be even more problems coming up in the future. Such as when conventional cages are removed. There will be a glut on the market of Free Range Free run eggs. And will animal rights groups even agree to the use of enriched cages.....a few maybe, but the hardcore activists....probably not. So what will you be doing for the farmer/industry then?

Supply management can be a great system DON"T SCREW IT UP!! make it work for all involved.

Response ID:24; pMR5MzizZBEdTkKkEY Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Organic

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

I'm sure it has but for me it hasn't yet, with the current demand for quota it will limit my ability to grow. I am a small producer looking to continue to grow.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

If more quota was available then more of the current demand would be filled. There is a potential for the price to trend down when demand slows.

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

As far as I am currently aware they affect all producers the same.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Yes, if all transfer assessments were taken away it would open up more access to new producers and current producers.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Yes, via a new entrant program. This program has been a really good success and the industry has many new producers in the industry. By removing the transfer assessments the industry can move forward with a focus on helping these new producers and all producers continue to grow.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

I do not see this changing. Family farms will continue to be passed down from one generation to the next.

8. Are whole farm transfers still important for succession or industry health?

Yes

10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

I suppose a case could be made for a long time manager/employee.

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No, I have only purchased quota off of the exchange.

12. How have quota assessment tools affected you? Tell us your story.

I have only been farming for 5 years and they have not affected me yet. However if quota is not made more available I do see a problem for small producers.

13. What, if anything, would you like to change?

I would like to shelf the new entrant program for the time being and focus on growing the large number of small producers. The new entrant program is a good program and can always be pulled off the shelf when needed in the future.

Response ID:25; gwzQwyu16YqVtygyMr Data

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Organic

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

I'm sure it has but for me it hasn't yet, with the current demand for quota it will limit my ability to grow. I am a small producer looking to continue to grow.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

If more quota was available then more of the current demand would be filled. There is a potential for the price to trend down when demand slows.

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10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

I suppose a case could be made for a long time manager/employee.

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No, I have only purchased quota off of the exchange.

12. How have quota assessment tools affected you? Tell us your story.

I have only been farming for 5 years and they have not affected me yet. However if quota is not made more available I do see a problem for small producers.

13. What, if anything, would you like to change?

I would like to shelf the new entrant program for the time being and focus on growing the large number of small producers. The new entrant program is a good program and can always be pulled off the shelf when needed in the future.

Response ID:26; 64RJv1CBNbgPhGbGEY Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Mixed Specialty

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

LIFO and the 10-10-10 assessment have limited the transfer of quota as farmers who do not want to sell all quota but just a limited amount to create space in barns and or use capital for re-tooling will end up losing more quota than they can afford to lose.

3. Do you think limited transfer assessments are contributing to increases in the price of quota? yes, the more quota on the market the less the price will be - the more limited we make quota the more people are willing to pay to acquire some

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

I do not believe so

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

yes - change LIFO to FIFO

rather than 10-10-10 how about making full ownership over 5 years so that new producers would have more equity sooner to expand there production

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

there are some people who are entering the industry by just buying quota when available on the market - this is why we need to increase the liquidity.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

I think there are some instances where a farm owner may be interested in making the farm manager part of his/her succession plan - would love to see barriers removed so that could happen - right now farm owner gets hit with a 5% clawback as well as clawback on growth which may inhibit the profitability of the farm as it is not operating at 100% capacity - it hurts cashflow

8. Are whole farm transfers still important for succession or industry health?

yes, - how do you sell a piece of property with a modern big empty chicken barn on it - farm worth more when it is operating. Some people may want to re-locate older run down farm with a newer modern farm and increase in size.

10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

yes - great way for new people who are already involved in farming and know the industry to be in-

the industry, the same tools should apply as to family.

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

yes - family succession transfer from parents to children

12. How have quota assessment tools affected you? Tell us your story.

As long as we stay farming with no plans of expansion I do not believe the assessment affects us, however if we want to expand or re-tool the assessment effects us in that there is very little quota for sale on the market as farmers do not like to get penalized to sell their quota. so they will not put for sale.

13. What, if anything, would you like to change?

I would like to change LIFO to FIFO which would have the same effect on new entrant as a mature producers- which i think would create more liquidity in the marketplace.

14. Other Comments?

LIFO - last in first out

FIFO - first in first out

rather than new entrants at 3000 birds maybe put new entrants at 5000 birds each and start up a few less.

maybe cap quota at a certain price - not going up after each exchange.

Response ID:27; L48DRviVAN0bsRMRq6 Data

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

New Entrant 6

Production Type

Organic

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

No

- 3. Do you think limited transfer assessments are contributing to increases in the price of quota?
 - No. I believe the demand for to grow or join the viable industry is increasing the price.
- 4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

Yes, with me myself being a new entrant I feel it is increasably hard to grow to a family supporting farm. This is due to the fact the 10/10/10 program makes banks not want to lend against quota that is not truly my farms quota.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

yes there are barriers for new producers to overcome, but this lets new entrants be true and show they will work to be in the industry.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

The only new entrants I know of are, new producers and younger generations taking over family farms. I only know of a few produces that have come into the industry

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

I am very new to the industry and do not know enough to help.

8. Are whole farm transfers still important for succession or industry health?

Yes.

9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

I am not yet Familar enough with our industry to comment on that.

10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No

11. How have quota assessment tools affected you? Tell us your story.

Yes they have by the price not being viable for young produces to start there own farm.

12. What, if anything, would you like to change?

I would change the amount of quota a new producer gets. I do agree that it is not a handout and new producers need to work for there spot in the company. On the other hand the amount won is viable if the 10/10/10 is removed. Then a new procurers can get bigger due to the bank being willing to lend against it.

13. Other Comments?

If more quota was available for winning new producers to buy right after the draw they could greatly help the industry. Example if a new producer won 3,000 units then before start date they each got a chance to buy an addictional 3,000 units

Response ID:28; gwzQ8yT16YqVtygyMr Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Free Range

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes, 10/10/10 and LIFO have made producers unwilling to sell quota because of the losses they would incur.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes, because producers are only paid for a potion of their quota, so they want a higher price to make up the difference.

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

New entrants should still have the 10/10/10 rule to keep that program fair. All new entrants should be started with the plan to continue farming for many years.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Changing the 10/10/10 to a 5 year plan and changing LIFO to FILO would help. I'd also like to see the price of quota on the exchange only go up \$5 annually. Right now producers know it will go up \$20 a year (as long as there is quota available on the exchange) and some producers are holding off selling because they know the price will be much higher in a year.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Whole farm sales, purchasing quota on the exchange, new producer program and succession are the only ways I know of. None of these are very prevalent.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

Transferring between siblings should allowed without the transfer assessment.

8. Are whole farm transfers still important for succession or industry health?

Yes, there are lots of farmers looking for another farm to help start their children.

10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

This is a tough question. It would be extremely hard to draw a line of who would be included and who would not in this. I don't know of any examples of non-family succession plans at this time.

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

I have purchased quota from the exchange.

12. How have quota assessment tools affected you? Tell us your story.

I am a new entrant trying to grow my farm. It is hard to do when there is very limited quota available on the exchange. I purchased quota from the exchange before I could use it because I'm not sure there will be any available when I need it.

13. What, if anything, would you like to change?

The board and staff do a really good job helping producers navigate through all the rules. I just wish more quota was available for sale, and transfer assessments are hindering producers from selling.

Response ID:29; OQLgzDHOAL9xFGeG8b Data

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

New Entrant 11

Production Type

Organic

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes, to a certain degree

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

No

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

No

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

I have no new ideas

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Not that i know of

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

No real changes

8. Are whole farm transfers still important for succession or industry health?

Yes, whole farm transfers are more stable

9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Not that important

10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No

11. How have quota assessment tools affected you? Tell us your story.

As a new entrant, it allowed me to begin my life long dream of owning and operating a family farm

12. What, if anything, would you like to change?

Nothing

Response ID:30; 4ZD26OtzrA01TOyOnA Data

1. (untitled)

Quota Holdings

Top 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Caged

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

yes. So if producers want to sell some quota to raise capital to retool they would loose most of their funds from clawbacks.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes. The less quota on the market the higher the demand, the more producers are willing too pay for quota.

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

Yes. Under LIFO, specialty and conventional producers are being assessed a clawback even tho they have been producing for 10,20,30 years. Where an new entrants have just started. FIFO would be more fair for all producers.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Yes. Change LIFO too FIFO.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

If there is more Quota available. People who would like to buy small lots of quota would have a greater chance of acquiring it.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

Yes and no. Succession planning may include a non-relative farm manager.

8. Are whole farm transfers still important for succession or industry health?

Yes

9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Yes. same assessments exemptions should apply to the non-family succession plan.

10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No. Still waiting

11. How have quota assessment tools affected you? Tell us your story.

Have not affected me as of now, but would like to see LIFO changed to FIFO

12. What, if anything, would you like to change?

Change LIFO too FIFI and change new entrant from 3000 to 5000. So instead of having 3 new entrants for 10000 birds, only have 2 new entrants for 10000 birds.

13. Other Comments?

CAP PRICE OF QUOTA

Response ID:31; 4ZD2IKFzrA01TOyOnA Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Mixed Conventional & Specialty

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

I believe they have, LIFO, 10/10/10 assessments have potentially significant financial impacts should a producer want to sell quota. Producers wishing to reduce such penalties would have held back selling quota. To what extent, I can't say, but the financial disincentive is strong, especially in recent years due to the quota increases we have had, so the potential backlog of quota that would have sold could be quite significant

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Absolutely, less quota for sale = higher price, I'm sure there are other factors but lack of quota availability would have a significant impact.

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

transfer assessments create a disincentive to sell for all producers. In the case of new entrants this may be desirable, however I feel there may be better ways to incentivize new entrants to remain and grow in our industry.10/10/10 in particular for new entrants, has restricted their ability to borrow and expand. I would suggest eliminating 10/10/10, and replacing it with attaching new entrant quota to a specific property for 10 years. This would remove the unintended consequences of 10/10/10, while still creating an incentive for new entrants to be engaged in farming long term

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Our current 5% assessment on quota sales, to fund our new entrant program, I personally don't have a problem with. However, eliminating LIFO and 10/10/10 would have a huge impact on quota liquidity in my opinion. Increasing quota liquidity should also relieve pressure on quota price. Our new entrant program is fine for bringing in new entrants, however I would suggest expanding it in a manner to retain them and incentivize them to expand their farms to a viable size rather than sell. I would suggest allowing new entrants to apply to the board to buy 3000 bird quota from the quota reserve pool at a reduced price, and only during the 10 years their quota is "new entrant quota" based on availability. The funds the board would generate from such sales could then be used to reduce levies for all producers. I believe this would create stronger "buy in" to the new entrant program by existing producers. A new entrant program is good for our industry, but a successful new entrant program, where new entrants opt to remain and grow, is even better.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

"back yard / unregistered "producers producing without quota has always been an issue in our supply managed industry. However, I believe having a successful new entrant program in place is one of the ways we can mitigate these issues

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

I believe assessments as well as quota price, have changed the ability of sons or daughters to be able to buy the family farm. Addressing quota liquidity issues, such as LIFO and 10/10/10 should help on this front as well.

8. Are whole farm transfers still important for succession or industry health?

yes

9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

As I understand it, quota can only transfer down to children free of assessment, not up. Also long time farm managers wanting to buy shares in a farm trigger assessments. Removing as many barriers to quota transfer as possible, is important in my view.

10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

Yes, I sold some of my quota in 2012

11. How have quota assessment tools affected you? Tell us your story.

In 2012, my farm tested positive for SE. The subsequent flock destruction, lack of sufficient insurance compensation, caused us a significant financial burden. At the time we had only purchased the farm a few years prior and still had a very high debt load. We made the decision to sell some quota to reduce our debt, so we would be more resilient to shocks in the future. Had it not been for this incident we would not have sold quota, especially with the assessments it triggered. We were assessed a little over 1800 birds, only 600 as a result of the 5%, but over 1200 due to LIFO and 10/10/10. We remain producers, and plan to continue for the forseeable future, if there was ever a chance that the LIFO / 10/10/10 assessments we were subject to could be reversed, we would love to produce those bird again, as the only reason we sold was due to unforeseen circumstances beyond our control.

12. What, if anything, would you like to change?

Ending LIFO, 10/10/10 would be the most significant changes we could make to improve quota liquidity. Enhancing our new entrant program to encourage expansion would benefit our industry. More and new voices are important, since the rules were changed eliminating the 20000 bird maximum farm size, there has been considerable consolidation in our industry. I believe a strong / expanded new entrant program would help reverse that trend.

13. Other Comments?

Our supply managed industry is a privilege that seems to be constantly under threat, not only from outside, but also from within. If we can find ways to improve it and making it more inclusive, we will all benefit in the long run.

Response ID:32; DwKXZ8C1d8DQtAZAnX Data

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

New Entrant 8

Production Type

Organic

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

As a New Producer Program winner who has not yet received quota, this does not yet apply to me.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes, because farmers don't get full value for the quota they are selling and are less willing to sell, driving up demand and with it, the price.

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

As a new entrant, the limited supply of quota available for purchase makes it difficult to expand the production unit large enough to be a sole income for a family.

- 5. Are there changes to quota transfer assessments or other tools- that could further reduce barriers to entry and increase quota availability?
- 6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Apart from entering the New Producer Program, I only know of people who were able to enter the egg industry because they were already involved in another supply-managed industry previously.

- 7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?
- 8. Are whole farm transfers still important for succession or industry health?
- 9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Yes, non-family succession structures are important as it gives flexibility in succession planning and hopefully allows smaller farms to continue as independent production units, as opposed to the production ending up at larger farms.

10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No

- 11. How have quota assessment tools affected you? Tell us your story.
- 12. What, if anything, would you like to change?
- 13. Other Comments?

Response ID:33; VQB619uIPVB5F2P2I8 Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Organic

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

No, not yet.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes, if demand was filled quota prices could potentially trend down.

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

The impact, if there is a difference, is still a negative impact to all producers.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

No, transfer assessments should be eliminated to allow engaged producers to grow.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Through the new entrant program and the quota exchange program. Both are successful and have allowed for several new producers to join the egg industry in BC.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

No, one generation will continue to pass it down to the next generation.

8. Are whole farm transfers still important for succession or industry health?

Yes

9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

There is a place for non-related parties, however that may leave room for dishonesty in the succession process.

10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No major purchases or sales

11. How have quota assessment tools affected you? Tell us your story.

Not so far however we would like to buy in the future.

12. What, if anything, would you like to change?

Allotments should be available to current producers instead of new entrants

Response ID:34; 8g4OrzF9Jgq2fM1MzL Data

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

New Entrant 2

Production Type

Organic

- 2. Have transfer assessments limited the transfer of quota, if so, to what extent?
- 3. Do you think limited transfer assessments are contributing to increases in the price of quota?
- 4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?
- 5. Are there changes to quota transfer assessments or other tools- that could further reduce barriers to entry and increase quota availability?
- 6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?
- 7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?
- 8. Are whole farm transfers still important for succession or industry health?
- 9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?
- 10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?
- 11. How have quota assessment tools affected you? Tell us your story.
- 12. What, if anything, would you like to change?
- 13. Other Comments?

Response ID:35; 97nBD5FNrO2Ps1Y1G6 Data

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

New Entrant 1

Production Type

Organic

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes, they have deterred potential sellers from putting quota on the market in the hopes that assessments will be adjusted down sometime in the future. The extent is hard to predict as they are on a farm by farm basis.

${\bf 3. \ Do\ you\ think\ limited\ transfer\ assessments\ are\ contributing\ to\ increases\ in\ the\ price\ of\ quota?}$

Yes, low supply/high demand = higher price

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

By limiting quota and increasing price it makes it far more difficult to locate and afford quota for new producers hoping to reach a critical mass. When planning new facilities or renovations it makes it more difficult and less efficient to build and plan for growth. When assessments are used to make quota available to NPP's it can create resentment from "some" current producers.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

We would like to see transfer assessments reduced or phased out in certain cases and/or classes. BC is in a massive deficit in egg supply, importing millions of eggs to meet our own demand. We would like to see major effort made to use that available supply space when allocating quota to New Producer Programs, or possibly making quota available through the exchange until we reach a supply/demand balance. There is no reason BC can't produce all its own eggs.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

I'm sure there are a few whole farm purchases, but we aren't aware of them. Before we won NPP quota we tried on two occasions to purchase a whole farm and the cost of quota and assessment loss by the existing producer were too big of barriers for entry.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

Family farm succession will always happen. But, there seems to be more young people interested and trying to enter agriculture from a non-farm background/family. I see long term buyouts of farmers (with no interested children) by non-family employees or farm managers.

8. Are whole farm transfers still important for succession or industry health?

Absolutely! There has to be a mechanism for retiring or exiting producers to get out of their property/production unit without having to completely tear down existing and useful equipment and buildings. Once the quota is gone from a farm the facilities are more or less useless. Its also very, very

important to make these opportunities available for new and prospective producers to get in to the industry without the huge cost of building all new production units.

9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Yes, young and new farmers are by and large open minded and excited about improvement, innovation, efficiency, animal welfare and consumer connection. Whereas older, retiring farmers on average are probably not so much. It is very important for the health and success of our industry that there are not too big of barriers for new farmers from non-farm backgrounds.

Tools would be anything educational - mentorship programs with current producers etc.

Also, some form of a lease to buy exemptions would be great that could go along with a record of employment for employees taking over a farm from a non family farm.

10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No

11. How have quota assessment tools affected you? Tell us your story.

Not yet, but we are feeling out current producers for a whole farm transfer and it is definitely a discussed barrier for a sale.

12. What, if anything, would you like to change?

We would like to see the assessments reduced or eliminated in certain classes. We would also like to see the egg deficit in BC pursued as soon as possible with EFC.

13. Other Comments?

Thank you for the opportunity to provide input on this process. We will be very interested to see results and hear input from long time, experienced producers in the industry. As new producers we have received an amazing amount of information and help from existing producers new and old. It has been a very welcoming industry and we are excited to be part of making it stronger!

Response ID:36; 2JLm6QSzKNEGTqmqRB Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Farm Manager

Production Type

Organic

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes. There are already a lot of complications with selling quota (succession, whole farm transfer, capital gains). No farmer would ever dream of reducing quota and buying back later per changing needs due to this transfer assessment.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes. The value of the quota is automatically 5% less. So a farmer owning quota wants more when they sell. Also the reduced selling is driving up demand. With grants, the 10/10/10 LIFO is especially causing farmers to hold out for a bigger payout.

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

Yes. The declining transfer assessments cannot be used as security to purchase additional quota or other financing. While 10/10/10 does have the potential to help prevent flipping for a gain, there have been loopholes employed that are unfair to others playing by the rules. A level playing field should exist for all.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Yes. Switch to deemed assessments. Advantages: 1) encourage more selling. 2) the deemed assessment amounts could be used to encourage more New Entrants.

Furthermore I heard of concern over "stale" quota credits. Could a fair method be used to put this into a quota credit pool to help out new entrants? Many of them cannot get new quota.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Buy quota or go in via new entrant program.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

It is becoming more and more difficult. Small farms are not easily viable any more, the margins are very small. Quota grants pad the lining of huge farms, but 3% on a small 3000 layer farm does barely anything to help their performance. Could grants instead go into the pool to be bought, or given preference to smaller farms at a reduced price?

8. Are whole farm transfers still important for succession or industry health?

Absolutely. I hope one day to buy my fathers farm. If a whole farm transfer is not possible, I will never be a farmer. The quota will be sold on the exchange and divided up 30 ways. Some to already huge farms and the land will have to be sold also.

10. Are non-family succession structures important for industry success going forward? If so, are there 205

related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Perhaps assessments on whole farm transfers could be exempt under a certain number of birds when the purchaser was new to the industry. So a huge operation could be incentivized to sell/split to smaller operations. Thus supporting the "family farm" concept in new farms that were not family before. What is important is that the playing field is even for everyone and loopholes do not persist, as these will break the industry apart.

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No

12. How have quota assessment tools affected you? Tell us your story.

My parents have a bunch of quota under LIFO 10/10/10. If they sell the quota to me and my siblings, they will lose that quota.

13. What, if anything, would you like to change?

Change to a deemed assessment or for small sales that support a new producer, allow the assessment to be eliminated. Remove grants, use this to sponsor new entrants or apply grants in a way that does not block the sale of quota assets.

14. Other Comments?

Please share survey findings and themes back to those who participated. Also what recommendations come from this.

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

New Entrant 10

Production Type

Organic

- 2. Have transfer assessments limited the transfer of quota, if so, to what extent?
- 3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes, and as s new entrant it will only make it more difficult to buy more quota.

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

Yes, as a new entrant I want to start my business knowing I can expand. We are building to be able to grow but we can't get equity before 10 years. A 5 years plan would make more sense.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Not penalizing producer on the sale of quota might help to make it more available on lower the price.

Give smaller farms first choice to buy that quota.

- 6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?
- 7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

As a new entrant, the idea of being able to past the farm down to our kids is the main reason we got in to it. With the size of some of those farm it's not a family farm anymore it's more like a factory. I think trying to keep farms from getting too big would help to keep them in the family.

8. Are whole farm transfers still important for succession or industry health?

Yes, we want to keep our children interested in farming and make sure that it's an attractive life style for them. They are the future of our industry, if we don't let them take over, we'll end up we just a few mega farm run like factories.

- 9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?
- 10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?
- 11. How have quota assessment tools affected you? Tell us your story.
- 12. What, if anything, would you like to change?
- 13. Other Comments?

Response ID:38; neDZqXs6yBKwSXwXeV Data

1. (untitled)

Quota Holdings

Top 25%

Region

BC

Owner/Farm Manager

Farm Manager

Production Type

Caged

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes, significantly by creating 2 major disincentives. Farmers that want to sell their farms lose significant equity upon the sale in addition to tax implications they face. These 2 forces work together to make selling very unappealing.

Additionally, farmers who are prepared to downsize as they get older and children lose interest are practically forced to continue farming at their current size because to sell a small portion of their operation they have to face significant assessment levels due to LIFO.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

If quota is more liquid I suspect the price would start to level off instead of the continuous upward trend we've been seeing.

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

I don't think these categories are impacted differently. The impact is felt rather equally for all producers aiming to grow. New entrants that have received their quota through the new producer program are impacted differently than those that bought in simply because realistically they can't sell, but that's about it.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Removing transfer assessments would greatly help increase quota availability. Currently, these quota is intended to fuel the new producer program, but by increasing the amount of quota available, new producers will have the opportunity to buy in and we will not need to rely on the NPP.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Many are purchasing quota on the revised exchange program. Also, farm succession planning is bringing many new producers into the industry.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

There is some change from the direct line of parents to children expanding to siblings or nephews/nieces. I've also heard of some wanting to pass down to long term farm managers.

8. Are whole farm transfers still important for succession or industry health?

Whole farm transfers are essential to maintain an efficiency in farm succession. If it is possible to keep a farm operational during a transfer as opposed to leaving it vacant and constructing new it is much more efficient.

Also, it gives opportunity to those who do not fall into the exemption categories for transfer to at least keep

the farm some what intact, particularly if assessments can be reduced.

9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

I'm unsure how important it is for industry success as it seems to be a fairly unusual exception. I think if any changes are made in this area it should be done cautiously in order to protect the family farming standard in BC as opposed to it becoming more of a large corporate structure or equity fund.

10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

Yes, we have purchased quota on the exchange.

11. How have quota assessment tools affected you? Tell us your story.

Yes, we are currently in succession planning on our family farm. The current limitations on exemptions have caused delay in this process as it is unclear whether some of my younger siblings will want to be involved or to what extent. Due to the fact that once I receive the quota I will not be able to transfer it back to my parents or on to my siblings we have to delay the process to avoid moving forward too aggressively and being stuck in a situation where we'd like to transfer quota to an additional sibling, but cannot do it without being assessed. This has caused some major planning challenges and we attempt to split up the farm amongst the siblings without breaking up the quota.

12. What, if anything, would you like to change?

I'd like to see quota transfer assessments eliminated completely, or at the very least moved to a FIFO model with ownership becoming 100% after 10 years.

I'd also like to see a target number for new entrants that includes those who have purchased quota. The quota that is reserved for them should come out of allocated growth and should be regulated in order to achieve the target level of new entrants and not exceed it. While it is a good program for the health of our industry, having too many new entrants will burden the industry and make us inefficient. If the target number is 2/year and 2/year are buying quota and entering the industry, than a lottery should not be required. This should be monitored on an ongoing basis and the quota reserves set aside for this program should be capped at a 3-5 year level for 2/year. After this all allocations should be given to current producers to allow for consistent growth to the producers who are helping create a vibrant industry in BC.

Response ID:39; vxALVgH3ybq8F0p0OR Data

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

New Entrant 3

Production Type

Organic

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

No idea

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

no idea

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

no idea

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

no idea

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Not sure, but as a small lot permit holder now, I feel if any one really, really actually wants to be an egg farmer as a career choice. The best way to start is at the "bottom rung of the ladder" as a small lot permit holder and go from there...

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

no idea

8. Are whole farm transfers still important for succession or industry health?

no idea

9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

no idea

10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

no

11. How have quota assessment tools affected you? Tell us your story.

They haven't yet.

12. What, if anything, would you like to change?

In all honesty, since my name was chosen in the new producer draw, I'm happy now:) However if my name

was not chosen I think I would feel this; "I wish there was more new producer random draws..."

Response ID:40; 54JDOxc5Z3BrH2g28R Data

1. (untitled)

Quota Holdings

Top 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Mixed Conventional & Specialty

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Νc

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

Yes

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Availability is not an issue

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Yes - some coming from other sm commodities. Others are entering after having unregulated flocks or sold out other businesses.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

Yes - sucesssion to other family members, cousins, nieces, nephews

8. Are whole farm transfers still important for succession or industry health?

Yes - many of these will take place in the next 10 years. 100% of quota must transfer - no claw backs

9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Not applicable to us

10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

Yes

11. How have quota assessment tools affected you? Tell us your story.

Haven't to this point, upon him leaving the farm either from complete transfer or death this will become an issue

12. What, if anything, would you like to change?

If quota is issued it should be 100% belong to the farm if they can produce it. With no claw backs. Or

13. Other Comments?

Response ID:41; OQLMQzuOAL9xFGeGgG Data

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Organic

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

limited quota available because of assessments

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

Because of 10-10-10 we don't have the equity to purchase quota as new entrants

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Switch to FIFO

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

No

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

No

8. Are whole farm transfers still important for succession or industry health?

Yes

9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Yes, we could take a farm manager that has been employed 10+ years and treat like a transfer to family

10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No

11. How have quota assessment tools affected you? Tell us your story.

Because of the small size of farm to start with, new entrants are unable to grow for the first 8-10 years. This is because of lack of cash flow.

12. What, if anything, would you like to change?

Could we set up a program for new entrants that after getting initial 3000 quota we would be eligible to buy 2000 more with a 1:1 match by the board to get farm size to 7000. This would make for a viable farm

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operation

13. Other Comments?

Could more quota be made available on the exchange to farms under 10000 base quota. Current exchange has limited exception for small farms

Response ID:42; 02v8bOcnZkO9lwrw50 Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Caged

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes, anytime an "assessment", "tax" or "penalty" is applied to a transaction, any business person is going to look at whether it is beneficial long term to do so. Given the circumstances today, after multiple new allocations, if a person is going to do anything with their quota, these "assessments" will most certain kill any potential deal.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes. The price of quota today now takes into account for these "assessments", thereby projecting a higher quota value than it would and should actually trade for

- 4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?
 - . I think transfer assessments impact new entrants by limiting their ability to grow due to the high quota value. Conventional producers are affected by the assessments by limiting their ability to sell some quota (without further penalties) to further invest in their operation.
- 5. Are there changes to quota transfer assessments or other tools- that could further reduce barriers to entry and increase quota availability?

Remove the 10/10/10 rule. Remove any restriction limiting or preferring any interested parties. Reduce the transfer of layer quota policy to a simple policy document.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Don't know?

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

I don't believe the 'traditional family farm approach' to succession is changing. Take a look at how many of young producers are involved in the industry today.

- 8. Are whole farm transfers still important for succession or industry health?
 - . Whole farm transfers are always important for succession and industry health. The more quota that is traded shows a viable industry
- 9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

The removal of any and all exemptions to quota transfers would make quota more available. Apply a flat assessment on all transfers, with the removal of 10/10/10 and quota will be much more available to anyone and everyone.

- 10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?
- 11. How have quota assessment tools affected you? Tell us your story.
- 12. What, if anything, would you like to change?
- 13. Other Comments?

Response ID:43; 8g4ngki9Jgq2fM1MYk Data

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Organic

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

limited quota available because of assessments

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

because of 10-10-10 we dont fave equity to purchase quota til after to 8 years in production

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Switch to fifo program

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

No

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

No

8. Are whole farm transfers still important for succession or industry health?

Yes

9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

yes take a long term farm hand or manager thats worked minimum 10 years of farm allow thrm to be treated like a family member transfer

10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No

11. How have quota assessment tools affected you? Tell us your story.

small size of farm new entrants are unable to expand do to lack of cashflow

12. What, if anything, would you like to change?

could we set up a program for all new entrants that after receiving initial 3000 units of quota we would be eligible to buy up to 2000 more with a 1:1 mach by the board to gey farm size to 7000 to make a more

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viable operation

13. Other Comments?

I would like to see more quota on exchange be made available to farms that are under 10000 base quota .Current exchange has limited help for small farms ...

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

New Entrant 5

Production Type

Organic

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Limited quota available because of the assessments.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

Because of 10-10-10, we do not save equity to purchase quota till after 8 years in production.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Switch to the FIFO system. First in first out.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

No

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

Nc

8. Are whole farm transfers still important for succession or industry health?

Yes

9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Yes, take a long term farm hand or a farm manger that has worked a minimum of 10 years on farm and allow them to be treated like a family member transfer.

10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No

11. How have quota assessment tools affected you? Tell us your story.

Because of the small size of farm, new entrants are unable to expand do to lack of cash flow.

12. What, if anything, would you like to change?

If we could set up a program for all new entrants, that after receiving the initial 3000 units of quota we would be eligible to buy up to 2000 more with a 1:1 match by the board, then bringing the flock size to 7000

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making it more a viable operation.

13. Other Comments?

Could more quota on the exchange be made to farms under 10,000 base quota. current exchange has limited help for small producers.

Response ID:45; L48y48HVAN0bsRMRxr Data

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Free Range

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes, because of transfer assessments, less quota is available.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes, when there is less people willing to sell quota, the prices are higher. This means only the well-off, large farms can afford the quota to grow.

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

Addressing this as new entrants, our ability to grow is greatly hindered since we don't have the equity in the quota to borrow against to grow. Start up costs are high.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Yes, changing to a first in, first out assessment would reduce a barrier. Also, giving people the ownership of more quota in the new entry program sooner would allow for quicker and greater growth.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Almost every new person we know in the industry is in through the New Entrant Program.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

We don't really know.

8. Are whole farm transfers still important for succession or industry health?

Yes, it seems to us that with the price of quota so high, we would be greatly reducing the opportunity for whole farms to stay whole if there isn't succession.

9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Unsure.

10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No

11. How have quota assessment tools affected you? Tell us your story.

We are greatly affected by the 10/10/10 assessment tool as new entrants. We have built in growth to our

new farm, with a barn with space for more quota. Our greatest barrier to growth is that we can't borrow again our quota because we don't own it yet.

12. What, if anything, would you like to change?

It would be great to own more of the quota earlier on in the New Entrant Program. Perhaps a matching program could be looked at, where if we are purchasing additional quota it will be matched (1:1) to allow our farm to grow to one which would be more viable. We believe something like this is being done in the broiler sector to encourage growth.

13. Other Comments?

As a small farm we would greatly benefit from a higher percentage quota issuance. 3% on 3000 birds is much different than 3% on 100000 birds. If smaller farms were given a greater percentage it would help the little guys to grow.

Quota Tools Stakeholders

Response ID:46; XQNIdVh2bDzxtKRKmD Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Caged

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Transfer assessments has led to an unnatural hording of quota. The current assessments unfairly penalize long standing producers and treat them the same as new entrants.

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes, I believe the transfer assessments have led to an unnatural hording of quotas and resultant increase in quota prices. This hording limits the amount of quota for sale, thus increasing its value as supply is not meeting demand. Furthermore, the assessment and resulting reduced volume of quota to be sold, encourages higher prices as the seller will want to be made whole despite the transfer assessment. Secondary to this, the assessment further reduces the amount of quota available for sale, compounding the situation.

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

Transfer assessments impact each type of production differently and each producer differently. If transfer assessments, mainly the 10-10-10 rule, were introduced to stop new entrants from selling off their newly acquired license to produce, then it has been successful but it has had other negative effects as well. It has penalized established farms, reducing the likelihood of selling off portions of quota to other producers and/or family.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

A policy change to a "First In, First Out" scenario for selling of quotas would be much better. It will keep new entrants from being able "flip" quota licenses, keeping out speculators. FIFO would increase quota availability, as established producers would more willingly sell off portions of quota to suit their business and future plans. Using FIFO, the hens available to be transferred with only 5-10% transfer assessment would help to ensure our market for eggs is supplied and not lost to a pool for future producers. Another policy change could change a 10-10-10 to a 50-5-10. In FIFO is not a good fit, then I would suggest a scale similar to 10-10-10 just starting at 50% immediate quota value, diminishing to 10% transfer assessment in 5 years (10% more per year). Currently, if my farm were to sell all of its quota only 80% would be able to be produced by the purchaser; this is bad news for a short on supply province trying to supply its market.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

There have been a couple of ways new producers have been entering the industry. Besides new entrants who have been given quotas, there are a few new producers who have purchased quotas.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you

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see upcoming that are current?

?

8. Are whole farm transfers still important for succession or industry health?

yes

9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

1

- 10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?
 - No I became a producer in 2004 as a family succession producer.
- 11. How have quota assessment tools affected you? Tell us your story.
- 12. What, if anything, would you like to change?

I disagree with quota assessment pools that are married to hold backs of new quotas issued. I do NOT like policy disagreements linked to quota issuance. Policy should be policy and quota issuance should happen as quickly as possible to ensure our egg market is being filled. Delays in the release of new quotas (essentially a demand for eggs) have put our BC processors at risk to losing out; already eggs are flowing in from other provinces to meet out lack of response to demand. It is a missed opportunity and it does not have to be; BCEMB and BC FIRB policy negotiations should be made outside of quota issuance cycles.

13. Other Comments?

Response ID:47; neDZelf6yBKwSXwXeV Data

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Free Range

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

I have not considered transferring quota as I have only owned quota since 2012, but with changes to NAFTA being discussed, selling has crossed my mind

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

I do. It's like anything else the higher the demand the price is likely to increase. If LIFO was altered it may ease the pressure with more farmers willing to sell

- 4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?
- 5. Are there changes to quota transfer assessments or other tools- that could further reduce barriers to entry and increase quota availability?
- 6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?
- 7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?
- 8. Are whole farm transfers still important for succession or industry health?
- 10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

I'm not sure

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

NO

12. How have quota assessment tools affected you? Tell us your story.

They have not had a significant affect to this point

13. What, if anything, would you like to change?

When quota is allocated I think the farmers with a below average size farm should be given a higher percentage of the allocation to provide growth opportunities

14. Other Comments?

Quota Tools Stakeholders

Response ID:48; vxAexGi3ybq8F0p0QG Data

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

Farm Manager

Production Type

Free Range

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

No.

 ${\bf 3. \ Do\ you\ think\ limited\ transfer\ assessments\ are\ contributing\ to\ increases\ in\ the\ price\ of\ quota?}$

YES!

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

YES!

We have purchased quota, however our base quota is new entrant quota. If we wished to sell our purchased quota, we would be looking at a very big loss. We may not even be able to sell any as according to LIFO, we would have to sell our New Entrant quota first, but that we can't do according to 10/10/10.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Yes. I believe there are many changes that could be made. Currently, there are only two ways to enter the industry: buy in, or 'win' through the quota lottery. I believe the industry is missing out on passionate people because of these barriers. There needs to be another way for people who are passionate about egg farming.

Consider developing some new entry programs through:

Research quota

Leasing quota

Having a smaller quota buy in (currently the minimum quota buy in would cost \$144,000 which is absolutely un-achievable for hard working small lot producers)

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Um...no.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

Yes. I think succession planing needs to take divorce into account across three generations. It needs to be simple, and quota needs to easily be sold without such a loss, to pay out a leaving party.

8. Are whole farm transfers still important for succession or industry health?

YES!!

If whole farm transfers don't happen, 'whole farms' won't exist! They will all be subdivided and cleared for shopping malls.

9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Absolutely!

Anyone seeking funding to purchase a whole farm needs to present a viable business plan to investors. Without that, a whole farm transfer to a non-family member is unlikely.

10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No.

11. How have quota assessment tools affected you? Tell us your story.

We won quota through the NPP. The 10/10/10 rule has affected us. We agree that NPP quota holders should adhere to a different set of rules, and have a long term commitment to the industry. The 10/10/10 as limited our access to financing. The banks will only fund on 60% of the quota value, and as we don't see that in the first year, we were unable to get the full amount of capital needed. However, we are fortunate to have eventually found a bank that was willing to work with us, and fund based on future quota holdings.

12. What, if anything, would you like to change?

I want to see another way for people to enter the industry. We are incredibly fortunate to have won through the NPP. Without this, there would be no other way 'in'. The \$10,000 deposit required was crippling to our family and farm. I know there are people out there who love producing eggs who can't grow their production. I believe the industry is missing out on these innovative passionate individuals. There should be a way for someone who demonstrates passion and commitment to the industry to become a part of it.

13. Other Comments?

I have begun to wonder if quota allocations can be conducted differently. It is a constant challenge to manage the growth. We built a big barn that cost us lots of money, in order to finance it and increase our cash flow, we needed to maximize our barn space. So we purchased more quota. Our new barn now is maxed out. With the next allocation, we are looking at more creative ways to house chickens, including retro-fitting our old smaller barn. It seems that everyone in the industry struggles with this one way or another. Many have had to give up their allocations as they simply cannot be placed. I believe they should see some financial return.

As egg production is more of a life-long career, I wonder if there is another way to evaluate quota allocations. It would be nice if producers could express if they wish to grow their production or maintain their production and quota would be allocated according to need. A model like this would have to be more consistent, and be able to more accurately predict egg consumption than the current model.

On that note; please look forward to predict egg consumption, not back 3 years! BC is so under produced, even being at the max utilization, we are not meeting BC demand and shipping in eggs from Alberta and the States. With the growing consumer trend to purchase local, it is important that BC has more egg production!

Consider reserving more of the quota allocations for new entrants. It is so important to have new people coming in regularly. They bring a fresh perspective and keep our industry strong and viable. They show the consumers that we are not an 'old boys club', but changing with our times.

Response ID:49; xzpMQ3I9NQwXfMeMzD Data

1. (untitled)

Quota Holdings

Middle 50%

Region

BC

Owner/Farm Manager

Owner

Production Type

Organic

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes. Not sure how much

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Somewhat. As long as egg farming is profitable and the supply managed system is shorting the market, prices will remain high.

- 4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?
- 5. Are there changes to quota transfer assessments or other tools- that could further reduce barriers to entry and increase quota availability?

10-10-5?

A pro rata penalty across all quota vintages that a farmer has

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

Some have entered by purchasing quota.

- 7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?
- 8. Are whole farm transfers still important for succession or industry health?

Yes

9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Yes.

10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No

11. How have quota assessment tools affected you? Tell us your story.

Yes. Quota has not been very available for expansion.

I received 5000 TRLQ in 2003 which has given me a start in egg farming, for which I am very thankful.

- 12. What, if anything, would you like to change?
- 13. Other Comments?

The length of time for producers to receive allocation in response to market growth has exacerbated the

problem by making quota more in demand.

Quota Tools Stakeholders

Response ID:50; gwzQ3yc16YqVtygyMr Data

1. (untitled)

Quota Holdings

Top 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Mixed Conventional & Specialty

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes, people are reluctant to sell quota if they know that 5% will be deducted from the sale. Farmers would rather hold onto the quota then sell if it means a 5% claw back. It also inflates the cost of quota as producers don't want to take the 5% deduction, so they inflate the cost accordingly. It also hinders succession planning among extended family and long term employees. Some families don't have immediate family members that want to carry on farming and others have loyal staff that want to get into farming. The assessments detour producers from executing those succession plans. The 10/10/10 LIFO program reduces the amount of quota transfered because producers will hold onto their quota until its saleable

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes, a 5% claw back only means that a producer needs to recoup that loss through the sale of the remaining quota.

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

yes, assessments restrict the movement of quota sales for all categories. New entrants cannot sell their new entrant quota, they have to run two classes of quota. If they were to purchase, they have the inability to transfer among family. They also struggle with purchasing large amounts of quota based on cash flow, and small lots of quota don't come up for sale because its not equitable for mainstream producers to sell small amounts and take an assessment. Mainstream producers who want to buy whole farms may see upwards of 15% less quota on that farm as a result of the sellers assessment and 10/10/10 LIFO circumstance. This makes whole farm purchases inefficient and less desirable.

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Yes, remove the LIFO 10/10/10 and the 5% clawbacks. Fund the new entrant program through market growth in allocation. If there is no growth, then take it out of the industry allocation. Either way, its still funding the program. Finally, increase succession planning opportunities for farmers by allowing them to sell to extended family and employees without ramifications.

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

New producers are entering the industry by way of succession planning. Families are passing down there farms to their kids by way of in family purchases. This is the definition of "New Entrant". Its bringing new blood, perspective and idea to the industry, and should be classified as a new entrant. If you consider this, the industry is taking on more than 1-2 new entrants a year.

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you

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see upcoming that are current?

It is changing. I find that some producers are wanting to involve extended family and long term employees in the succession of their farm. The current assessments hinder that approach.

8. Are whole farm transfers still important for succession or industry health?

Yes, farm transfers allow new producers into the industry. Like any industry, purchasing an operating business is much simpler then starting from scratch. whole farm transfers are better for succession planning.

9. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Yes, the industry needs new producers with new ideas, and the only way to do that is by having a method in place to organize both non-family and family succession structures. New entrants are not only lottery winners, but also the next generation of farmers. This should seriously be considered when making changes.

10. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

No

11. How have quota assessment tools affected you? Tell us your story.

I have purchased a whole farm where assessments reduced the total amount of quota transferred resulting in reduced barn densities and ultimately a less efficient farm. Assessments make whole farm transfers inefficient.

12. What, if anything, would you like to change?

Remove the assessments, fund the new entrant program through industry growth, and strongly consider a "New Entrant" as anybody entering the industry for the first time, not just lottery winners. Next generation producers are new entrants, as they bring new life to the industry.

13. Other Comments?

Response ID:51; rK4AQnH1RNJ8t4R4bY Data

1. (untitled)

Quota Holdings

Bottom 25%

Region

BC

Owner/Farm Manager

Owner

Production Type

Free Run

2. Have transfer assessments limited the transfer of quota, if so, to what extent?

Yes

3. Do you think limited transfer assessments are contributing to increases in the price of quota?

Yes, for sure

4. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

Not really

5. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Changing the 10/10/10 and life

6. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

When quota becomes available, they have a chance

7. Is the traditional family farm approach to succession changing? If so, what succession changes do you see upcoming that are current?

No comment

8. Are whole farm transfers still important for succession or industry health?

Absolutely!

10. Are non-family succession structures important for industry success going forward? If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

Not sure

11. Have you transferred quota between 2005 and now (including transfers where no clawbacks occurred)?

We purchased quota

12. How have quota assessment tools affected you? Tell us your story.

Yes, we would have liked purchased more quota

13. What, if anything, would you like to change?

More availability of quota coming for sale

14. Other Comments?

QUOTA ASSESSMENT TOOLS CONSULTATION

Consultation #2
PowerPoint Presentation

BC Egg Marketing Board



Quota Assessment Tools Evaluation May 8, 2017





Agenda

- 1. Opening Remarks
- 2. History of Quota Assessment Tools
- 3. Purpose of the Evaluation
- 4. Timeline Update
- 5. Preliminary Survey Result Summary
- 6. Survey 2 Discussion Questions
- 7. BC FIRB Expectations
- 8. Closing Remarks



History 2005 Specialty Review

1. 2 year review process

Review specialty products and markets in the supply managed commodities

2. Assessed submissions based on:

- Registration
- Designation of specialty product markets
- Allocation
- Production and Marketing Quota
- Quota Transfer
- Levies
- New Entrants
- Representation

3. Provided Boards with policy directions



Purpose

Quota Assessment Tools Evaluation

To determine if industry and public interest policy outcomes are still being achieved and if there are unintended consequences

1. Policy Objectives

- Quota is intended to be produced
- Quota is transferrable
- Producers are actively engaged and committed to the industry
- Quota is available to commodity boards to support policy objectives, including the development of specialty markets and providing for new entrants in the supply management system

2. Areas of Focus

- Transfer Assessment Structure
- Industry Entry, including transfer assessment exemptions



Process

Quota Assessment Tools Evaluation

1. 2 Stakeholder Consultations

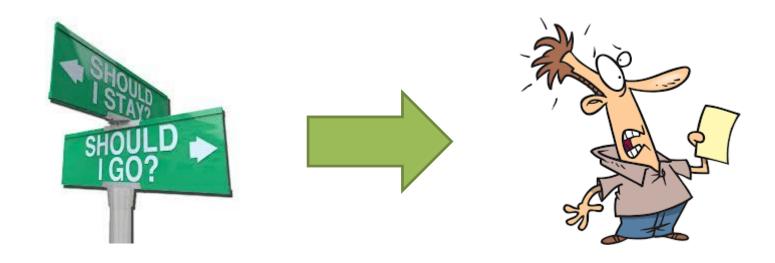
- 1. Provide an evaluation on whether the 2005 Specialty Review policy objectives related to transfer assessments and industry entry are being fulfilled
- 2. Identify what, if any, changes are requested and how they:
 - Meet with the 2005 policy objectives
 - Are supported by industry
 - Reflect the 2004 Ministry of Agriculture Regulated Marketing Economic Policy
 - Fulfill Sound Marketing Policy
 - Fulfill the public interest

2. Summarize Current State of the Industry

- All current quota distribution, transfer and assessment policies and practices
- Illustrate the state of quota movement, assessment and industry entry between 2005 and 2016



Discussion Questions Liquidity in Quota





Discussion Questions Liquidity in Quota





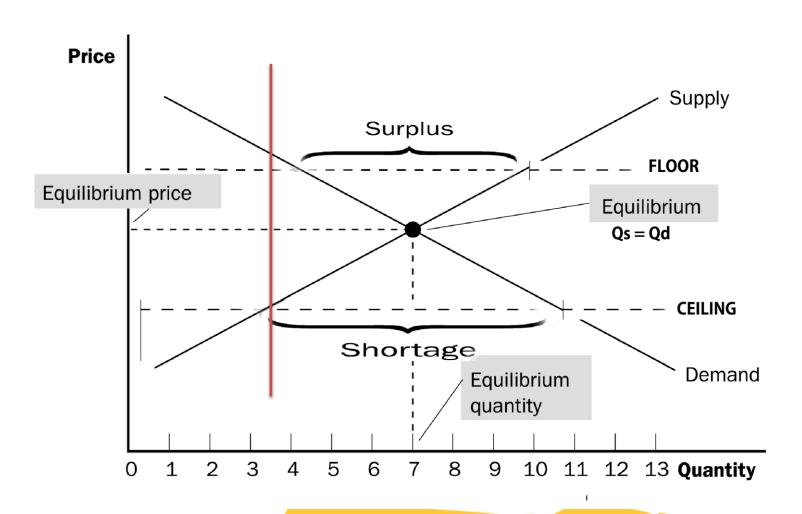


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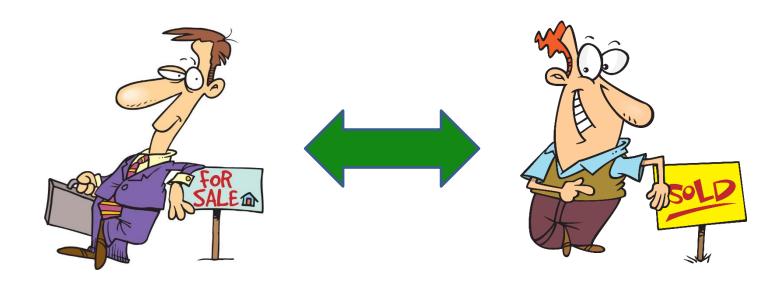


Supply and Demand



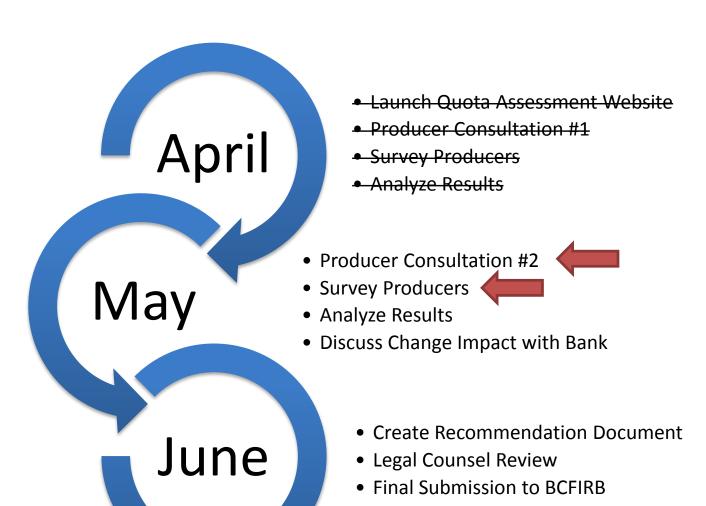


Discussion Questions Liquidity in Quota





Timeline Quota Assessment Tools Evaluation





Preliminary Survey Results Summary

45 of 180 Recipients Responded to Survey (25%)

Consensus:

- Current transfer assessment policy is limiting the liquidity of quota
- Extensive feedback received on NPP and its implementation

Plan:

- Will do NPP Consultation in Fall 2017
- Will do Quota Allocation Consultation Fall 2017



Survey Results

1. Have transfer assessments limited the transfer of quota, if so, to what extent?

YES	NO	Not Sure
33	7	5



Survey Results

3. Do transfer assessments impact new entrants, specialty and conventional producers differently, and if so, how?

YES	NO	Not Sure
20	16	9



Survey Results

4. Are there changes to quota transfer assessments – or other tools- that could further reduce barriers to entry and increase quota availability?

Various Answers	NO	Not Sure
37	2	6



2. Do you think limited transfer assessments are contributing to increases in the price of quota?

YES	NO	Not Sure
39	3	3



5. Are there other ways in which new people are entering the industry, what are they and how prevalent are they?

YES	NO	Not Sure
7	0	38



6. Are whole farm transfers still important for succession or industry health?

YES	NO	Not Sure
41	0	4



7. Are non-family succession structures important for industry success going forward?

If so, are there related quota management tools that could support this approach to farm succession in addition to, or in place of, transfer assessment exemptions?

YES	NO	Not Sure
15	2	28



8. Have you transferred quota between 2005 and now?

YES	NO	No Comment
16	17	12



How have quota assessment tools affected you? Tell us your story.

Negatively Affected	Unaffected	No Comment
32	11	2



10. What, if anything, would you like to change?

11. Other Comments?



WHAT IS LIFO?

Last In First Out

- Guiding principle that dictates what quota is assessed first with non-exempt transfers
- Where to start



WHAT IS 10/10/10?

- On Allocations
 - Producer gains 10% ownership every year
 - After 10 years producing quota, there is a 10% final assessment incurred on non-exempt transfer
 - What rule applies

Anniversary	Years of	% to	% to
Date	Vested Interest	BCEMB	Producer
Prior to 1st	0	100%	0
After 1st	1	90%	10
After 2nd	2	80%	20
After 3rd	3	70%	30
After 4th	4	60%	40
After 5th	5	50%	50
After 6th	6	40%	60
After 7th	7	30%	70
After 8th	8	20%	80
After 9th	9	10%	90



LIFO and 10/10/10 interaction?

- > LIFO dictates where assessment starts
- ➤ 10/10/10 dictates how assessment is calculated



Example of Interaction

Example #1

- Base quota of 10,000
- Accepted every issuance on the first day
- Due to unforeseen circumstances, producer needs to sell 750 quota



LIFO and 10/10/10 interaction?

LIFO dictates where assessment starts 10/10/10 dictates how assessment is calculated

Allocation Percentage	# Special Allocation Birds Issued	Special Allocation Issued Date	Full Years Vested Interest	Assessment % At Today	Assessed: Return to BCEMB	# Birds Transferable
·						
	10,000	Sep-04		5%	7	138
3.00%	300	8-Nov-09	7	30%	90	210
3.46%	356	28-Nov-10	6	40%	143	213
3.25%	346	19-Oct-14	2	80%	277	69
2.70%	297	26-Apr-15	2	80%	238	59
2.65%	299	26-Jul-15 3	1	90%	269	30
2.587%	300	3-Apr-16 2	1	90%	270	30
3.148%	375	2-Apr-17 1	0	100%	375	0
	IFO_	TOTAL:	10/10		1,669	750



LIFO and 10/10/10 interaction?

LIFO dictates where assessment starts 10/10/10 dictates how assessment is calculated

Allocation Percentage	# Special Allocation Birds Issued	Special Allocation Issued Date	Full Years Vested Interest	Assessment % At Today	Assessed: Return to BCEMB	# Birds Transferable
roroomago	211 412 122 42	1000000000				
	10,000	Sep-04		5%	7	138
3.00%	300	8-Nov-09	7	30%	90	210
3.46%	356	28-Nov-10	6	40%	143	213
3.25%	346	19-Oct-14	2	80%	277	69
2.70%	297	26-Apr-15	2	80%	238	59
2.65%	299	26-Jul-15 3	1	90%	269	30
2.587%	300	3-Apr-16 2	1	90%	270	30
3.148%	375	2-Apr-17 1	0	100%	375	0
	150	TOTAL:	10/10		1,669	750

20120





Discussion Questions Quota Assessment Tools Evaluation

1. 1. Do you think LIFO (Last In First Out) should be removed? Yes/No

IF YES: Here are options that meet the SAFETI principles with which we could replace LIFO. Please rank them in order of preference (1 being most favored approach)

- 1. First In First Out (FIFO)
- 2. Nothing dictating which quota is sold first
- 3. Other: Please specify



1. First In First Out (FIFO)

Allocation	# Special Alloc	Special Allocation	Full Years	Assessment %	Assessed:	# Birds
Percentage	Birds Issued	sued Date	Vested Interest	At Today	Return to BCEMB	Transferable
	10,000	Sep-04 1		5%	500	9,50
3.00%	300	8-Nov-09 2	7	30%	90	21
3.46%	356	28-Nov-10 2	6	40%	143	21
3.25%	346	19-Oct-14	2	80%	277	6
2.70%	297	26-Apr-15	2	80%	238	5
2.65%	299	26-Jul-15	1	90%	269	3
2.587%	300	3-Apr-16	1	90%	270	3
3.148%	375	2-Apr-17	0	100%	375	
		TOTAL:			2,162	10,11



1. First In First Out (FIFO)

	# Special Alloc	C!-! All	F V	A 4 0/	A	# D:I-
Allocation		Special Allocation	Full Years	Assessment %	Assessed:	# Birds
Percentage	Birds Issued	sued Date	Vested Interest	At Today	Return to BCEMB	Transferable
	790	Sep-04 1		5%	40	750
3.00%	300	8-Nov-09 2	7	30%		
3.46%	356	28-Nov-10 2	6	40%		
3.25%	346	19-Oct-14	2	80%		
2.70%	297	26-Apr-15	2	80%		
2.65%	299	26-Jul-15	1	90%		
2.587%	300	3-Apr-16	1	90%		
3.148%	375	2-Apr-17	0	100%		
		TOTAL:			40	750





2. Nothing dictating which quota is sold first



Allocation	# Special Allocation	Special Allocation	Full Years	Assessment %	Assessed:	# Birds
Percentage	Birds Issued	Issued Date	Vested Interest	At Today	Return to BCEMB	Transferable
	10,000	Sep-04		5%	500	9,500
3.00%	300	8-Nov-09	7	30%	90	210
3.46%	356	28-Nov-10	6	40%	143	213
3.25%	346	19-Oct-14	2	80%	277	69
2.70%	297	26-Apr-15	2	80%	238	59
2.65%	299	26-Jul-15	1	90%	269	30
2.587%	300	3-Apr-16	1	90%	270	30
3.148%	375	2-Apr-17	0	100%	375	0
		TOTAL:			2,162	10,112



2. Nothing dictating which quota is sold first

Allocation	# Special Allocation	Special Allocation	Full Years	Assessment %	Assessed:	# Birds
Percentage	Birds Issued	Issued Date	Vested Interest	At Today	Return to BCEMB	Transferable
	790	Sep-04 1		5%	40	750
3.00%	300	8-Nov-09	7	30%		
3.46%	356	28-Nov-10	6	40%		
3.25%	346	19-Oct-14	2	80%		
2.70%	297	26-Apr-15	2	80%		
2.65%	299	26-Jul-15	1	90%		
2.587%	300	3-Apr-16	1	90%		
3.148%	375	2-Apr-17	0	100%		
		TOTAL:			40	750





Discussion Questions Quota Assessment Tools Evaluation

2. Do you think 10/10/10 should removed? Yes/No

IF YES: Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (1 being most favored approach)

- 1. No Conditions
- 2. Replace with 10/10/5
- 3. 0/95/2 All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota, he/she is subject to:
 - a 100% claw back on all issuances that have been produced for less than 1 year
 - Forfeiture of all future issuances for a period of 2 years.
- 4. Other: Please specify



Whole Farm Sale Non-Exempt Example

Example #2

- Base quota of 10,000
- Accepted every issuance on the first day
- After farming for 50 years, producer would like to retire
 - No Children
 - No Siblings



Whole Farm Sale Non-Exempt Example

Allocation Percentage	# Special Allocation Birds Issued	Special Allocation Issued Date	Full Years Vested Interest	Assessment % At Today	Assessed: Return to BCEMB	# Birds Transferable
	10,000	Sep-04		5%	500	9,500
3.00%	300	8-Nov-09	7	30%	90	210
3.46%	356	28-Nov-10	6	40%	143	213
3.25%	346	19-Oct-14	2	80%	277	69
2.70%	297	26-Apr-15	2	80%	238	59
2.65%	299	26-Jul-15	1	90%	269	30
2.587%	300	3-Apr-16	1	90%	270	30
3.148%	375	2-Apr-17	0	100%	375	0
		TOTAL:			2,162	10,112





1. No Conditions

Allocation Percentage	# Special Allocation Birds Issued	Special Allocation Issued Date	Full Years Vested Interest	Assessment % At Today	Assessed: Return to BCEMB	# Birds Transferable
-						
	10,000	Sep-04		5%	500	9,500
3.00%	300	8-Nov-09	7	5%	15	285
3.46%	356	28-Nov-10	6	5%	18	338
3.25%	346	19-Oct-14	2	5%	17	329
2.70%	297	26-Apr-15	2	5%	15	282
2.65%	299	26-Jul-15	1	5%	15	284
2.587%	300	3-Apr-16	1	5%	15	285
3.148%	375	2-Apr-17	0	5%	19	356
		TOTAL:			614	11,660

Result:

- Single quota class
- Instant 95% ownership
- Increased liquidity?



2. Replace with 10/10/5

# Special Allocation	Special Allocation	ears	Assessment %	ssed:	# Birds
Birds Issued	Issued Date	o ed Interest	At Today	n to BCEMB	Transferable
	P		\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\		
10,000	Sep-04		5%	500	9,500
300	Nov-09	7	30%	90	210
356	Nov-10	6	40%	143	213
346	Oct-14	2	80%	277	69
297	Apr-15	2	80%	238	59
299	Jul-15	1	90%	269	30
300	Apr-16	1	90%	270	30
375	Apr-17	0	100%	375	0
	TOTAL:			2,162	10,112
	10,000 300 356 346 297 299 300	10,000 Sep-04 Nov-09 Nov-10 Oct-14 Apr-15 Jul-15 Apr-16 Apr-17	10,000 Sep-04 7 300 Nov-09 7 356 Nov-10 6 346 Oct-14 2 297 Apr-15 2 299 Jul-15 1 300 Apr-16 1 375 Apr-17 0	10,000 Sep-04 300 Nov-09 7 356 Nov-10 6 346 Oct-14 2 297 Apr-15 2 299 Jul-15 1 300 Apr-16 1 375 Apr-17 0 100%	Sep-04 S

Result:

• Single quota class after 10 years of ownership



- 3. 0/95/2 All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota, he/she is subject to:
 - 100% claw back on all issuances that have been produced for less than 1 year

Forfeiture of all future issuances for a period of 2 years.

					CV	
Allocation	# Special Allocation	Special Allocation	Full Years	Assessment %	One quota cre	# Birds
Percentage	Birds Issued	Issued Date	Vested Interest	At Today	CEMB	Transferable
					0,,	
	10,000	Sep-04		5%	500	9,500
3.00%	300	8-Nov-09	7	5%	15	285
3.46%	356	28-Nov-10	6	5%	18	338
3.25%	346	19-Oct-14	2	5%	17	329
2.70%	297	26-Apr-15	2	5%	15	282
2.65%	299	26-Jul-15	1	5%	15	284
2.587%	300	3-Apr-16	1	5%	15	285
3.148%	375	2-Apr-17	0	100%	375	0
		TOTAL:			FO/25 970	11,304

Result:

- Single quota class after 1 year of ownership
- Cannot sell to "make room" without consequence
- Increased Liquidity



- 3. 0/95/2 All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota, he/she is subject to:
 - 100% claw back on all issuances that have been produced for less than 1 year

Forfeiture of all future issuances for a period of 2 years.

							J,
Alloca	ition	# Special Allocation	Special Allocation	Full Years	Assessment %	Ase	# Birds
Percen	itage	Birds Issued	Issued Date	Vested Interest	At Today	CO AMB	Transferable
						One quota	
		10,000	Sep-04		5%	500	9,500
	3.00%	300	8-Nov-09	7	5%	15	285
	3.46%	356	28-Nov-10	6	5%	18	338
	3.25%	346	19-Oct-14	2	5%	17	329
	2.70%	297	26-Apr-15	2	5%	15	282
	2.65%	299	26-Jul-15	1	5%	15	284
	2.587%	300	3-Apr-16	1	5%	15	285
	3.148%	375	2-Apr-17	0	100%	375	0
	2.000%	245	1-Dec-17	0	100%	245	0
ot real	2.500%	313	1-Apr-18	0	100%	313	0
ot icai	3.000%	385	1-Mar-19	0	100%	385	0
			TOTAL:			1,913	11,304

273



4. Pro Rata 10/10/10

_				00		
Total Quota	12,274					
Total Quota Offered	750	% of Total Quota	6%	% for transfer	7.12%	
Allocation	# Special Allocation	Special Allocation	Full Years	Vested Interest	Assessed:	# Birds
Percentage	Birds Issued	Issued Date	Vested Interest	At Today	Return to BCEMB	Transferable
	10,000	Sep-04		5%	36	676
3.00%	300	08-Nov-09	9	10%	2	19
3.46%	356	28-Nov-10	8	20%	5	20
3.25%	346	19-Oct-14	4	60%	15	10
2.70%	297	26-Apr-15	3	70%	15	6
2.65%	299	26-Jul-15	3	70%	15	6
2.587%	300	03-Apr-16	3	70%	15	6
3.148%	375	02-Apr-17	2	80%	21	5
		TOTAL:			124	750



Timing of Policy Changes

- 4. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?
 - ☐ Yes
 - ☐ No (Keep LIFO & 10/10/10 for issuances that occurred between 2005-2017)



Succession Planning

Currently, transfers that are exempt from clawbacks include:

- (1) transfers to spouse
- (2) transfer from parent to child
- (3) transfer from parent to child and spouse
- (4) transfers where ownership structure doesn't change
- 5. Should the policy around exempt transfers be expanded to include any of the following? Please check all that apply
- Yes, exempt transfers should also include...
 - From sibling to sibling
 - ☐ From child to parent
 - ☐ Transfer to nieces and nephews
 - From grandparent to grandchild
 - To long-standing farm managers
 - ☐ Other (specify)
- No/there should be no expansion to the policy for exempt transfers



Succession Planning

***IF YOU SELECTED LONG TERM FARM MANAGER

What qualifications should the farm manager meet to be eligible for the transfer?

- ☐ At least 7 years as a full-time farm manager
- ☐ At least 10 years as a full-time farm manager
- ☐ At least 15 years as a full-time farm manager
- ☐ Other: Please specify



New Producer Program Changes

6. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

□Yes

***If Yes – End Survey.

If No, send to Q7.



New Producer Program Changes LIFO Replacement Options

- 7. If no, here are options that meet the SAFETI principles with which we could replace LIFO. Please rank them in order of preference (1 being most favored approach):
 - First In First Out (FIFO)
 - Nothing dictating which quota is sold first
 - Other: Please explain



New Producer Program Changes 10/10/10

8. Do you think 10/10/10 should be removed from the New Producer Program?

☐ Yes

***If No – end survey.

If Yes, send to Q9.



New Producer Program Changes 10/10/10 Replacement Options

- 9. If yes, here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank them in order of preference (1 being most favored approach)
 - No Conditions
 - Replace with 10/10/5
 - 0/95/2 All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota, he/she is subject to:
 - a 100% claw back on all issuances that have been produced for less than 1 year
 - Forfeiture of all future issuances for a period of 2 years.
 - Other: Please Explain



BCFIRB's Expectations Quota Assessment Tools Evaluation

1. Summary of quota distribution policies

 Assist BCFIRB with evaluating any proposed changes to transfer assessments and industry entry

2. State of Quota movement, assessments and industry entry between 2005 and 2016

- Qualitative year over year allocations, production split, quota transferred,
 quota assessed, industry entry statistics
- Quantitative case studies from producers and value chain members on transfer assessments and industry entry

3. Consultation Questions

As presented by BCFIRB and stated previously

4. Recommended Changes

Supported by industry, meet 2005 objectives, SAFETI and Regulated
 Marketing Economic Policy, fulfill the public interest.



SAFETI Principles

- Strategic Identify key opportunities and systemic challenges, and plan for actions to effectively manage risks and take advantage of future opportunities.
- 2. Accountable Maintain legitimacy and integrity through understanding and discharging responsibilities and reporting performance.
- 3. Fair Ensure procedural fairness in processes and decision-making.
- **4. Effective** A clearly defined outcome with appropriate processes and measures.
- **5. Transparent** Ensure that processes, practices, procedures & reporting on exercise of mandate are open, accessible and fully informed.
- **6. Inclusive** Ensure that appropriate interests, including the public interest, are considered.



Regulated Marketing Economic Policy

- 1. Public Interest operates in the interests of all British Columbians
- 2. National Systems BC government supports the participation of BC producers in national supply managed systems when the provisions of the national agreements are consistent with the growth and prosperity of the agri-food industry.
- 3. Maintaining and Gaining Markets, and serving BC demand supports the development of new markets identified at the production, marketing, and processing level to facilitate industry growth and competitiveness.
- **4. Entry of New Producers** facilitates the entry of new producers to sustain and renew regulated industries in new and existing markets.



Regulated Marketing Economic Policy

- **5.** The Value Chain facilitates cooperation among producers, marketing agencies, input industries, processors, and retailers, with a view to achieving efficiencies throughout the entire system, and enhancing value in the marketplace.
- **6. Safety and Quality** builds consumer preference for British Columbia product by encouraging the production of high quality, safe food.
- 7. Recognition of Standards recognize, and encourage producers to participate in, the voluntary standards programs sanctioned by the Province and national standards sanctioned by the Federal Government as standards for identifying and labelling specialty products.
- **8. Regional Industries -** contributes to economic activity and stability in all regions of British Columbia.



Thank you!

Questions?

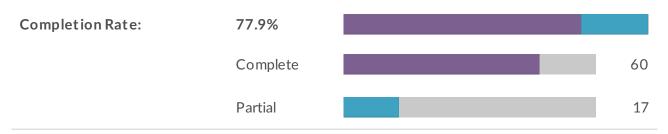
QUOTA ASSESSMENT TOOLS CONSULTATION

BC Egg Marketing Board

Consultation #2
Level 1: Industry Summary

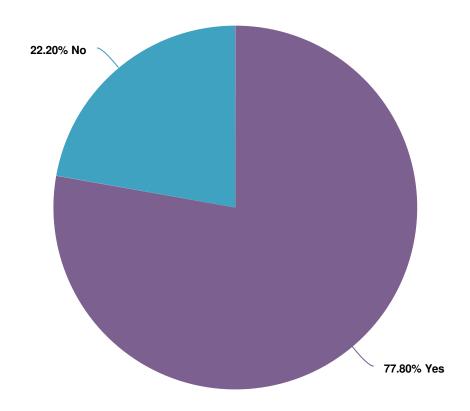
Report for Quota Tools Assessment Follow Up Survey

Response Counts



Total: 77

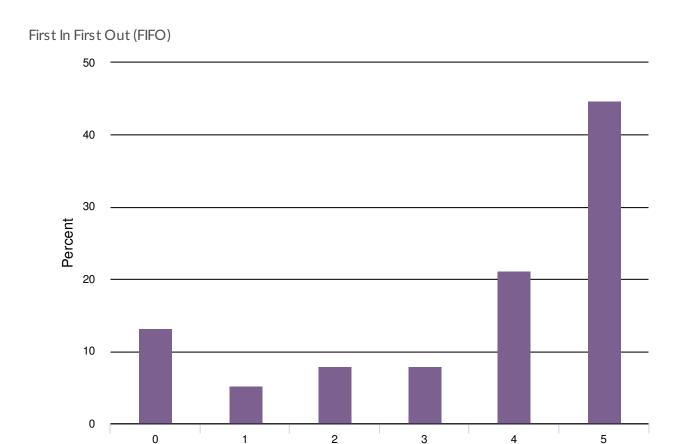
1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.



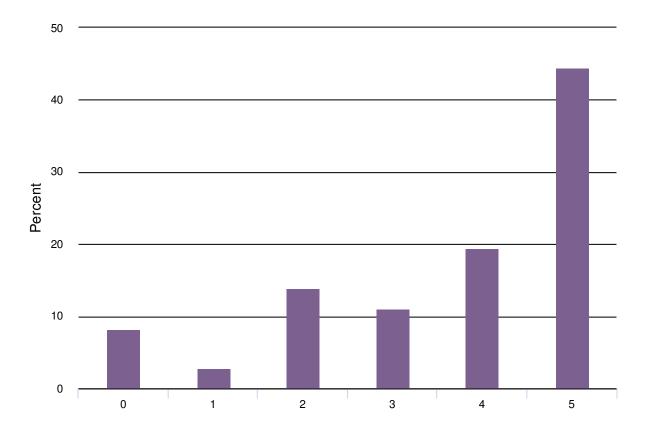
Value	Percent	Responses
Yes	77.8%	49
No	22.2%	14

Total: 63

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).



Nothing dictating which quota is sold first



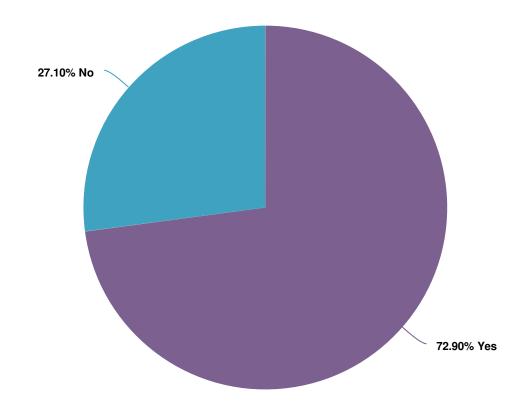
Other, please specify

3. Please tell us if there is another option to the previous question.

Count Response

2 None	IRST OUT
	IRST OUT
1 A PRORATED LAST IN F	
1 A simplified version with market shrinks, it gets tal	no strings attached. Quota can flow to who wants it, and if the ken back.
Back in the day just mathought. If you didn't get	an to man dealings on quota dealings worked real well I involved u missed out
1 Don't know	
1 I like the 50/2/5	
1 I prefer FIFO	
1 Let the free increase's be	e the last to be sold
	or LIFO. FIRB should put a fair assessment policy in place that managed commodity groups.
1 Would prefer FIFO	

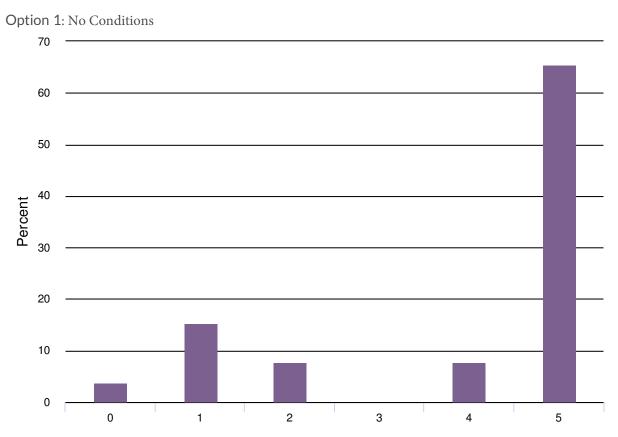
4. Do you think 10/10/10 should removed? Please see the website for some examples.



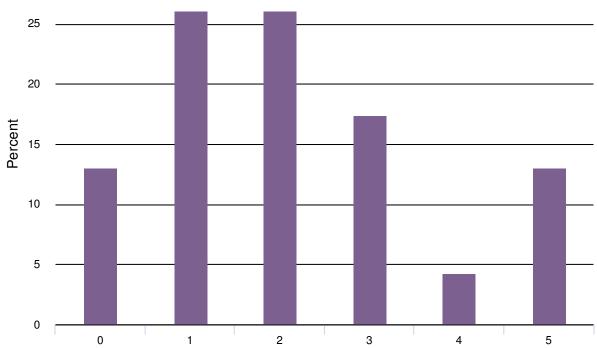
Value	Percent	Responses
Yes	72.9%	43
No	27.1%	16

Total: 59

- 5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples. The options are:
 - **Option 1: No Conditions**
 - Option 2: Replace with 10/10/5
 - Option 3: 0/95/2 All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to:
 - 1. A 100% claw back on all issuances that have been produced for less than 1 year producer
 - 2. Forfeiture of all future issuances for a period of 2 years.

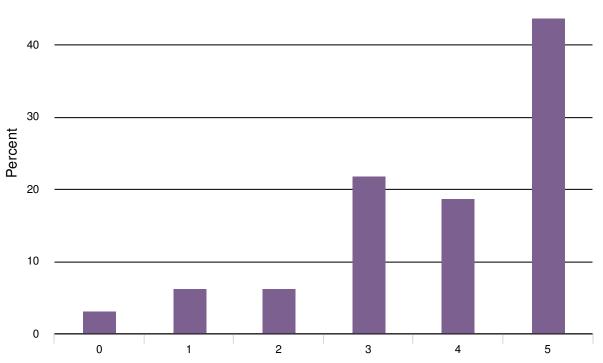






Option 3: Replace with 0/95/2

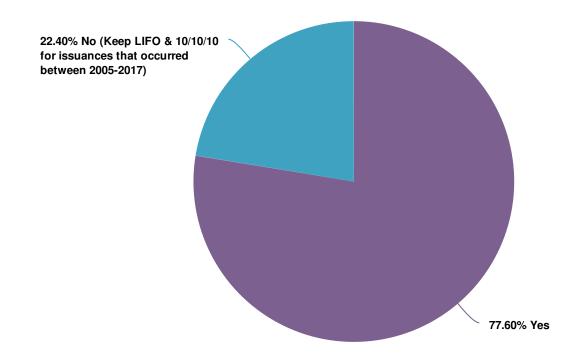




6. Please tell us if there is another option to the previous question.

Count	Response
1	Allow exceptions to $10/10/10$ for succession farming and scenarios the support newer smaller operations. Stop giving grants to large farms.
1	I do like option 3, however it doesn't work in a year where there are no increases, and it certainly doesn't work if there are claw-backs. I believe no conditions with the board always retaining 5% is the best way to go.
1	New producers 10 yrs, for producers over 20 years no conditions
1	No
1	No conditions
1	PRORATED CLAWBACK 10/10
1	Please see answer to question 4
1	Pro Rata
1	Simpler the better.
1	You could look at a one sale of quota not more then 25% which would only have the claw back of 5% to 10%. Whih that you could only do that 1 time per every 15 years, or something along that line. If they would sell anymore or before the 15 years then they would pay the claw back penatly.

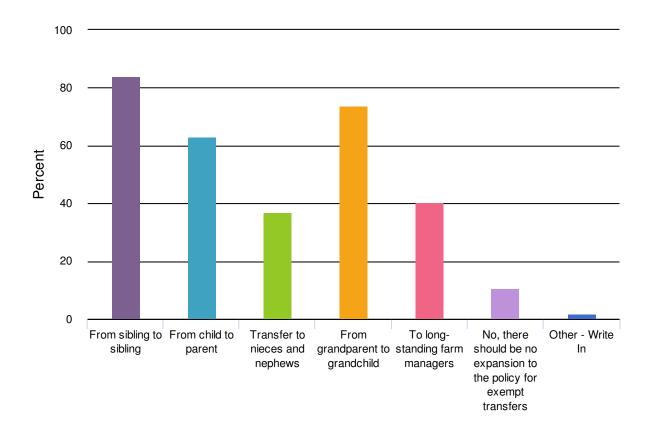
7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?



Value	Percent	Responses
Yes	77.6%	45
No (Keep LIFO & 10/10/10 for issuances that occurred between 2005-2017)	22.4%	13

Total: 58

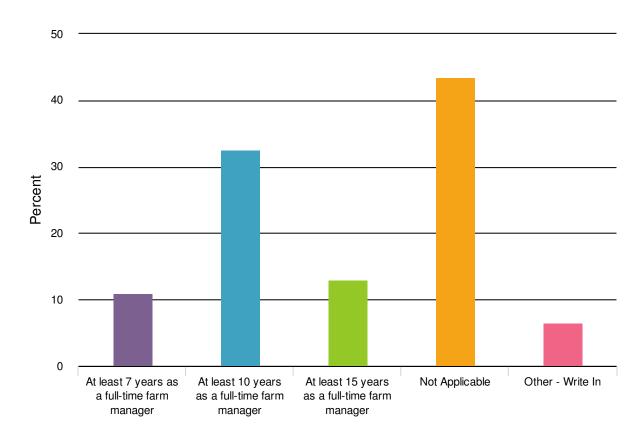
8. Should the policy around exempt transfers be expanded to include any of the following? Please check all that apply.



Value	Percent	Responses
From sibling to sibling	84.2%	48
From child to parent	63.2%	36
Transfer to nieces and nephews	36.8%	21
From grandparent to grandchild	73.7%	42
To long-standing farm managers	40.4%	23
No, there should be no expansion to the policy for exempt transfers	10.5%	6
Other - Write In	1.8%	1

Other - Write In	Count
Farm Managers is a tricky one. It could fall under a flat rate clawback ro a min % onwership.	1
Total	1

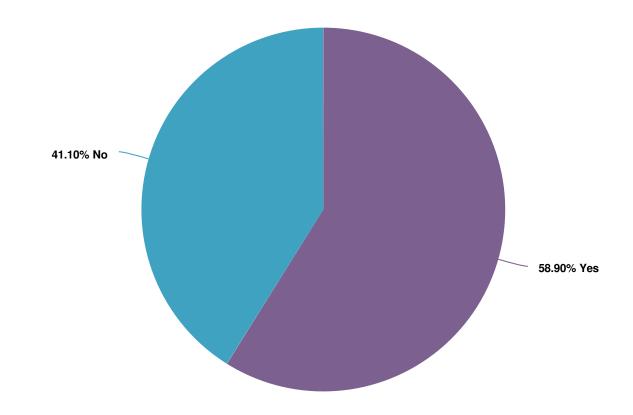
9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?



Value	Percent	Responses
At least 7 years as a full-time farm manager	10.9%	5
At least 10 years as a full-time farm manager	32.6%	15
At least 15 years as a full-time farm manager	13.0%	6
Not Applicable	43.5%	20
Other - Write In	6.5%	3

Other - Write In	Count
5 years	1
Farm Managers is a tricky one. It could fall under a flat rate clawback ro a min % onwership. Should this also include land holdings?	1
Farm manager has shown comitment to the industry and must operate under the same rules as NPP holders, so cannot transfer quota for 10yrs. Actually, that really should be the same for all tranfers without assements	1
Total	3

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

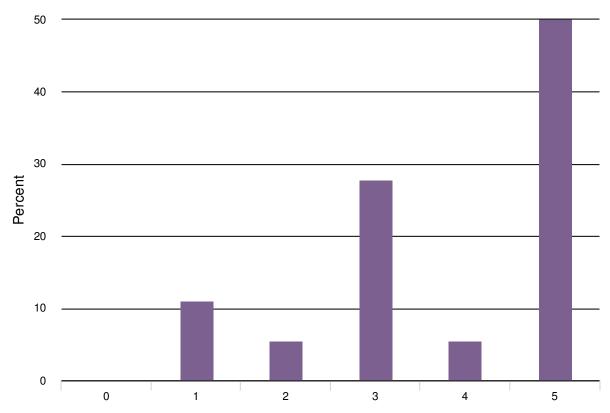


Value	Percent	Responses
Yes	58.9%	33
No	41.1%	23

Total: 56

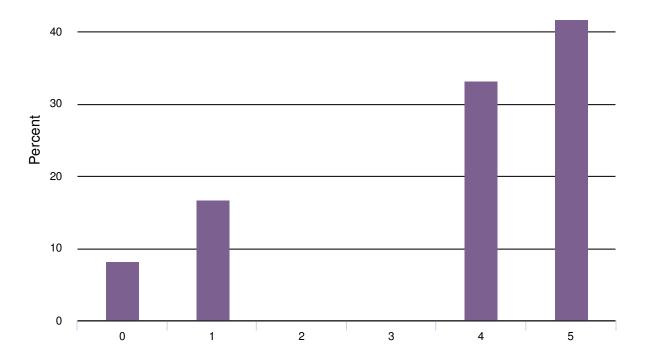
11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).





Nothing dictating which quota is sold first

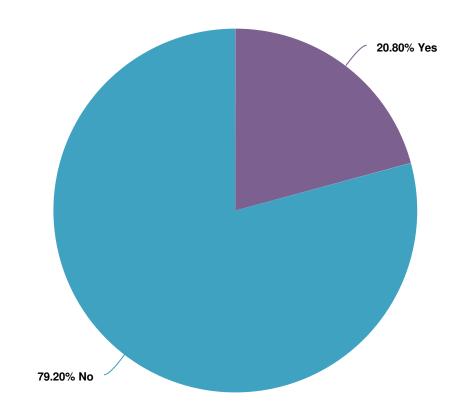




12. Please tell us if there is another option to the previous question.

Count	Response
1	100% ownership in the first year to gain borrowing equity. Non-transferrable other than to family members for 10 years, then follows the same class/principals as regular quota
1	If this last question pertains to NPP then I have to say they are held captive by 10/10/10. If otherwise, then zero restrictions.
1	Perhaps new entrants should have to buy an equal amount of quota on the exchange in order for "free" quota to be theirs. Helps eliminate the "winning the lottery"
1	This seems to be a repeat question
1	any given quota should not be sold for 10 years unless it is a farm sale
1	ny given quota should no be able to be sold for ten years unless it is part of a complete farm sale
1	old producer must be in the industry for at least 10 years . i mean any supply management in bc.

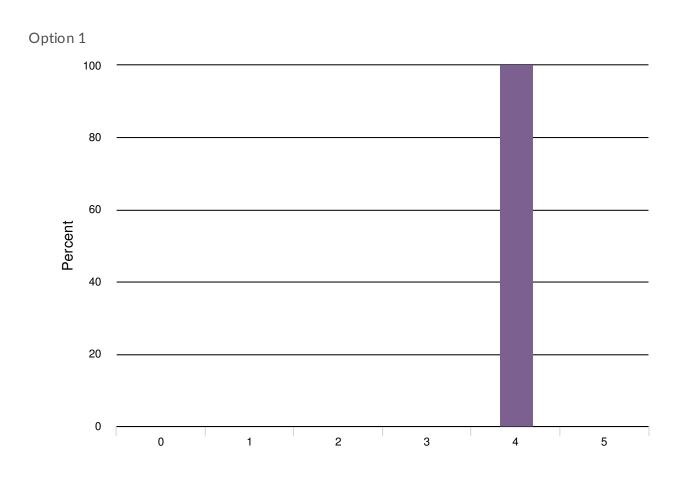
13. Do you think 10/10/10 should be removed from the New Producer Program?



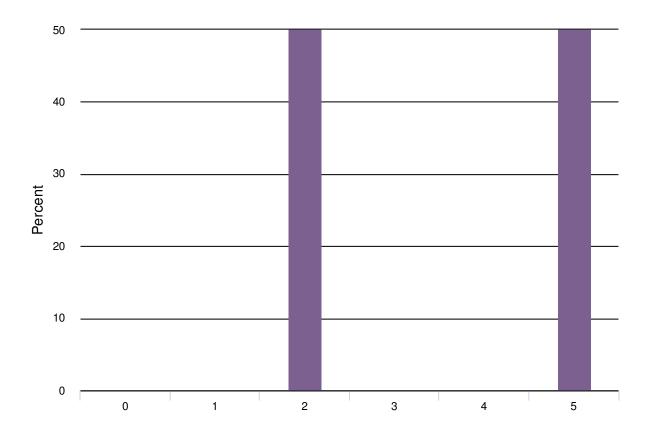
Value	Percent	Responses
Yes	20.8%	5
No	79.2%	19

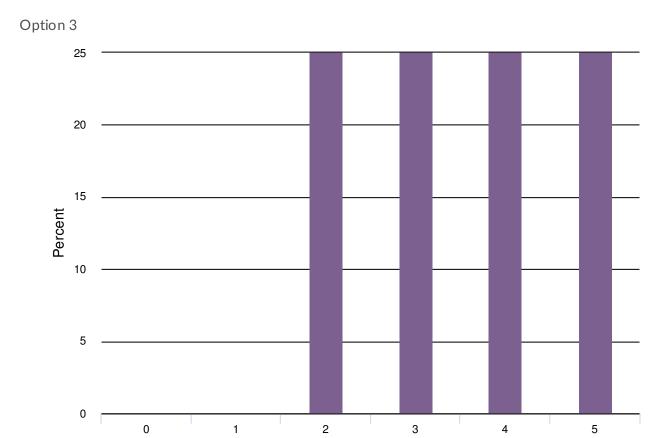
Total: 24

14. If yes, here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank them in order of preference (5 being most favored approach). Please see the website for examples. The options are: Option 1: No conditions Option 2: Replace with 10/10/5 Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota, he/she is subject to: 1. a 100% claw back on all issuances that have been produced for less than 1 year; 2. Forfeiture of all future issuances for a period of 2 years.



Option 2





15. Please tell us if there is another option to the previous question.

Count Response

1 Ithink NPP should gain 100% equity in the first year to increase borrowing power but 100% clawback if sold inside 10 years. After 10 years of production should be treated 0/95/2

QUOTA ASSESSMENT TOOLS CONSULTATION

BC Egg Marketing Board

Consultation #2
Level 2: Cross Tabulation of Survey Reponses Based on Variables

Do you think LIFO (Last In First Out) should be removed?						
	YES	NO	N/A			
LM – Top 25%	10	3	2			
LM – Middle 50%	20	6	2			
LM – Bottom 25%	8	2	6			
INT – Top 25%	1	0	1			
INT – Middle 50%	2	0	0			
INT – Bottom 25%	4	2	1			
VI – Top 25%	0	0	0			
VI – Middle 50%	2	1	0			
VI – Bottom 25%	2	0	0			
Unknown	5	1	2			

•			•	•		which we could re	•
		L: FIFO (FIF					•
	0	1	2	3	4	5	Weighted Average
	N/A	Least				Most Favored	3 33 3 3
LM - Top 25%	8	1	1			2	1.08
LM – Middle 50%	16		1	2	4	3	1.50
LM – Bottom 25%	10			1	2	3	1.63
INT – Top 25%	2						0
INT – Middle 50%			1			1	3.5
INT – Bottom 25%	2	1				3	2.67
VI – Top 25%							0
VI – Middle 50%	1					2	3.33
VI – Bottom 25%					2		4
Unknown	5					3	1.88
Total	44	2	3	3	8	17	1.74
		Option 2	: Not	hing	dicta	ating which transfe	ers first
	0 N/A	1 Least	2	3	4	5 Most Favored	Weighted Average
LM – Top 25%	7		1	1		3	1.67
LM – Middle 50%	14		2	0	4	6	1.92
LM – Bottom 25%	8		1	2	1	4	2
INT – Top 25%	2						0
INT – Middle 50%	1					1	2.5
INT – Bottom 25%	4				2		1.33
VI – Top 25%							0
VI – Middle 50%	3						0
VI – Bottom 25%			1	1			2.5
Unknown	6					2	1.25
Total	45	0	5	4	7	16	1.69

3. Please tell us if the	nere is another option to the previous question
LM – Top 25%	 Don't know Back in the day just man to man dealings on quota dealings worked real well I thought. If you didn't get involved u missed out A simplified version with no strings attached. Quota can flow to who wants it, and if the market shrinks, it gets taken back.
LM – Middle 50%	NoneLet the free increase's be the last to be soldI prefer FIFO
LM – Bottom 25%	 There should be no FIFO or LIFO. FIRB should put a fair assessment policy in place that would apply to all supply managed commodity groups.
INT - Top 25%	
INT – Middle 50%	
INT – Bottom 25%	- A PRORATED LAST IN FIRST OUT
VI – Top 25%	
VI – Middle 50%	NoneWould prefer FIFO
VI – Bottom 25%	- I like the 50/2/5
Unknown	

4. Do you think 10/10/10 should removed?						
	YES	NO	N/A			
LM – Top 25%	8	2	2			
LM – Middle 50%	15	6	5			
LM – Bottom 25%	6	3	7			
INT – Top 25%	0	1	1			
INT – Middle 50%	1	1	0			
INT – Bottom 25%	5	1	0			
VI – Top 25%	0	0	0			
VI – Middle 50%	2	1	0			
VI – Bottom 25%	2	0	0			
Unknown	4	1	9			

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach).

	Option	1: No Cond	lition	S			
	0	1	2	3	4	5	Weighted Average
	N/A	Least				Most Favored	
LM – Top 25%	7		1			4	1.83
LM – Middle 50%	18	2			1	5	1.19
LM – Bottom 25%	12	1				3	1
INT – Top 25%	2						0
INT – Middle 50%	1	1					0.5
INT – Bottom 25%	2	1			1	2	2.5
2VI – Top 25%			1				2
VI – Middle 50%	3						0
VI – Bottom 25%						2	5
Unknown	7					1	.63
Total	52	5	2	0	2	17	1.31
	Option :	2: Replace	with	10/1	0/5		
	0	1	2	3	4	5	Weighted Average
	N/A	Least				Most Favored	
LM – Top 25%	8		2	1		1	1
LM – Middle 50%	18	2	3	2	1		0.69
LM – Bottom 25%	12	3				1	0.5
INT – Top 25%	2						0
INT – Middle 50%	2						0
INT – Bottom 25%	4		1			1	1.17
VI – Top 25%							0
VI – Middle 50%	3						0
VI – Bottom 25%	1			1			1.5
Unknown	8						0
Total	58	5	6	4	1	3	0.62
	Option :	3: Replace	with	0/95	/2		
	0	1	2	3	4	5	Weighted Average
	N/A	Least				Most Favored	
LM – Top 25%	9		1		1	1	0.92
LM – Middle 50%	14	1	1	5	2	3	1.58
LM – Bottom 25%	10	1		2	1	2	1.31
INT – Top 25%	2						0
INT – Middle 50%	1					1	2.5
INT – Bottom 25%	3					3	2.5
VI – Top 25%							0
VI – Middle 50%	2					1	1.67
VI – Bottom 25%					2		4
Unknown	5					3	1.88
Total	46	2	2	7	6	14	1.57

6. Please tell us if there	is another option to the previous question
LM – Top 25%	- No
	- No conditions
	- Pro Rata
LM – Middle 50%	 New producers 10 yrs, for producers over 20 years no conditions Allow exceptions to 10/10/10 for succession farming and scenarios the support newer smaller operations. Stop giving grants to large farms.
	 Simpler the better. You could look at a one sale of quota not more than 25% which would only have the claw back of 5% to 10 %. With that you could only do that 1 time per every 15 years, or something along that line. If they would sell anymore or before the 15 years then they would pay the claw back penalty.
LM – Bottom 25%	- Please see answer to question 4
INT – Top 25%	
INT – Middle 50%	
INT – Bottom 25%	- PRORATED CLAWBACK 10/10
VI – Top 25%	
VI – Middle 50%	
VI – Bottom 25%	 I do like option 3, however it doesn't work in a year where there are no increases, and it certainly doesn't work if there are claw-backs. I believe no conditions with the board always retaining 5% is the best way to go.
Unknown	

7. If there are changes applicable to all quot	to transfer assessments a held?	from this review, sho	ould the changes be
	YES	NO	N/A
LM – Top 25%	7	3	2
LM – Middle 50%	16	5	5
LM – Bottom 25%	8	1	7
INT – Top 25%			2
INT – Middle 50%	2		
INT – Bottom 25%	4	2	
VI – Top 25%			
VI – Middle 50%	2	1	
VI – Bottom 25%	2		
Unknown	4	1	9

8. Should the po	olicy arour	nd exem _l	ot transfers b	e expanded to i	nclude any of t	he
	sibling to sibling	child to parent	nieces and nephews	grandparent to grandchild	long-standing farm managers	No Expansion to Policy
LM – Top 25%	10	6	4	10	4	
LM – Middle 50%	17	14	7	14	8	2
LM – Bottom 25%	5	4	3	6	2	2
INT – Top 25%						
INT – Middle 50%	2	2	1	1	1	
INT – Bottom 25%	6	5	2	6	4	
VI – Top 25%						
VI – Middle 50%	2	2	1	2	2	1
VI – Bottom 25%	2	2	2	2	1	
Unknown	4	1	1	1	1	1

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?							
	7+ Years FT Manager	10+ Years FT Manager	15+ Years FT Manager				
LM – Top 25%	2	5					
LM – Middle 50%	1	5	2				
LM – Bottom 25%		2					
INT – Top 25%							
INT – Middle 50%							
INT – Bottom 25%	1		3				
VI – Top 25%							
VI – Middle 50%		1	1				
VI – Bottom 25%		2					
Unknown	1						

10. Please tell us if	there is another option to the previous question
LM – Top 25%	
LM – Middle 50%	- Farm Managers is a tricky one. It could fall under a flat rate clawback ro a min % onwership. Should this also include land holdings?
LM – Bottom 25%	
INT – Top 25%	
INT – Middle 50%	
INT – Bottom 25%	
VI – Top 25%	
VI – Middle 50%	
VI – Bottom 25%	 5 years Farm manager has shown comitment to the industry and must operate under the same rules as NPP holders, so cannot transfer quota for 10yrs. Actually, that really should be the same for all tranfers without assements
Unknown	

11. If LIFO or 10/10/10 a If Yes, Survey comple If No, Continue to No		ota program be subject	to the same changes?
ii ito, continue to it	YES	NO	N/A
LM – Top 25%	5	5	2
LM – Middle 50%	13	8	5
LM – Bottom 25%	7	2	7
INT – Top 25%			
INT – Middle 50%	2		
INT – Bottom 25%	3	2	
VI – Top 25%			
VI – Middle 50%	1	2	
VI – Bottom 25%	1	1	
Unknown	1	3	

12. Here are options that meet the SAFETI principles with which we could replace LIFO. Please rank them in order of preference (5 being most favored approach)

	Option 1: FIFO	(FIRST IN F	IRST OUT)		
	1	2	3	4	5
	Least				Most Favored
LM – Top 25%		1	1		2
LM – Middle 50%			3	1	1
LM – Bottom 25%	1		1		
INT – Top 25%					
INT – Middle 50%					
INT – Bottom 25%	1				1
VI – Top 25%					
VI – Middle 50%					2
VI – Bottom 25%					1
Unknown					1
	Option 2: Noth	ing dictatin	ng which transf	fers first	
	1	2	3	4	5
	Least				Most Favored
LM – Top 25%				1	2
LM – Middle 50%	1			1	2
LM – Bottom 25%					1
INT – Top 25%					
INT – Middle 50%					
INT – Bottom 25%				1	
VI – Top 25%					
VI – Middle 50%					
VI – Bottom 25%				1	
Unknown	1				

13. Please tell us if there	e is another option to the previous question			
LM – Top 25%	 Perhaps new entrants should have to buy an equal amount of quota on the exchange in order for "free" quota to be theirs. Helps eliminate the "winning the lottery" If this last question pertains to NPP then I have to say they are held captive by 10/10/10. If otherwise, then zero restrictions. 			
LM – Middle 50%	 old producer must be in the industry for at least 10 years . I mean any supply management in BC. 			
LM – Bottom 25%				
INT – Top 25%				
INT – Middle 50%				
INT – Bottom 25%	 This seems to be a repeat question 100% ownership in the first year to gain borrowing equity. Non-transferrable other than to family members for 10 years, then follows the same class/principals as regular quota 			
VI – Top 25%				
VI – Middle 50%				
VI – Bottom 25%				
Unknown	 any given quota should not be able to be sold for ten years unless it is part of a complete farm sale any given quota should not be sold for 10 years unless it is a farm sale 			

14. Do you think 10/10/10 should be removed from the New Producer Program?					
	YES	NO			
LM - Top 25%	1	4			
LM – Middle 50%	2	6			
LM – Bottom 25%		2			
INT – Top 25%					
INT – Middle 50%					
INT – Bottom 25%	1	2			
VI – Top 25%					
VI – Middle 50%		2			
VI – Bottom 25%		1			
Unknown	1	2			

15. If yes, here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank them in order of preference (5 being most favored approach).

	Option 1: No Co							
	1	2	3	4	5			
	Least				Most Favored			
LM – Top 25%				1				
LM – Middle 50%								
LM – Bottom 25%								
INT – Top 25%								
INT – Middle 50%								
INT – Bottom 25%								
VI – Top 25%								
VI – Middle 50%								
VI – Bottom 25%								
Unknown								
	Option 2: 10/10	Option 2: 10/10/5						
	1	2	3	4	5			
	Least				Most Favored			
LM – Top 25%		1						
LM – Middle 50%					1			
LM – Bottom 25%								
INT – Top 25%								
INT – Middle 50%								
INT – Bottom 25%								
VI – Top 25%								
VI – Middle 50%								
VI – Bottom 25%								
Unknown								
	Option 3: 0/95/2							
	1	2	3	4	5			
	Least				Most Favored			
LM – Top 25%			1					
LM – Middle 50%		1	1	1				
LM – Bottom 25%								
INT – Top 25%								
INT – Middle 50%								
INT – Bottom 25%					1			
VI – Top 25%								
VI – Middle 50%								
VI – Bottom 25%								
Unknown								

16. Please tell us if there i	is another option to the previous question
LM – Top 25%	
LM – Middle 50%	
LM – Bottom 25%	
INT – Top 25%	
INT – Middle 50%	
INT – Bottom 25%	 I think NPP should gain 100% equity in the first year to increase borrowing power but 100% clawback if sold inside 10 years. After 10 years of production should be treated 0/95/2
VI – Top 25%	
VI – Middle 50%	
VI – Bottom 25%	
Unknown	

QUOTA ASSESSMENT TOOLS CONSULTATION

Consultation #2

Level 3: Individual Responses

BC Egg Marketing Board Response ID:5; oLdVwwhn8X6BfRomR8 Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

No

- 3. (untitled)
- 2. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

- 4. (untitled)
- 3. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 3:5

4. Please tell us if there is another option to the previous question.

New producers 10 yrs, for producers over 20 years no conditions

- 5. (untitled)
- 5. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

No (Keep LIFO & 10/10/10 for issuances that occurred between 2005-2017)

- 6. (untitled)
- 6. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

Response ID:6; qWd9WptQkg0GSqvRqm Data

1. (untitled)

quota holdings

Top 25%

location

LM

owner/farm manager

Owner

production type

Mixed Conventional & Specialty

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

Nothing dictating which quota is sold first: 0

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 3:0

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

No (Keep LIFO & 10/10/10 for issuances that occurred between 2005-2017)

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling From grandparent to grandchild

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 10 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:7; 1dLpzGFW04dncO1eOR Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Free Run

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

No

- 3. (untitled)
- 2. Do you think 10/10/10 should removed? Please see the website for some examples.
- 4. (untitled)
- 3. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

- 4. Please tell us if there is another option to the previous question.
- 5. (untitled)
- 5. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?
- 6. (untitled)
- 6. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

- 7. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?
- 7. (untitled)

8. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

8. (untitled)

- 9. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 10. Please tell us if there is another option to the previous question.

9. (untitled)

11. Do you think 10/10/10 should be removed from the New Producer Program?

10. (untitled)

12. If yes, here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank them in order of preference (5 being most favored approach).

Please see the website for examples. The options are:

Option 1: No conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota, he/she is subject to: 1. a 100% claw back on all issuances that have been produced for less than 1 year; 2. Forfeiture of all future issuances for a period of 2 years.

13. Please tell us if there is another option to the previous question.

Response ID:8; azGjzZtBxQK0cJ60Jg Data

1. (untitled)

quota holdings

Top 25%

location

LM

owner/farm manager

Owner

production type

Mixed Conventional & Specialty

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 1 Nothing dictating which quota is sold first: 5

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:5 Option 2:0 Option 3:2

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling From child to parent

From grandparent to grandchild

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 10 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO) : 2 Nothing dictating which quota is sold first : 5

12. Please tell us if there is another option to the previous question.

Perhaps new entrants should have to buy an equal amount of quota on the exchange in order for "free" quota to be theirs. Helps eliminate the "winning the lottery"

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

Yes

10. (untitled)

14. If yes, here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank them in order of preference (5 being most favored approach).

Please see the website for examples. The options are:

Option 1: No conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota, he/she is subject to: 1. a 100% claw back on all issuances that have been produced for less than 1 year; 2. Forfeiture of all future issuances for a period of 2 years.

Option 2:2 Option 3:3

15. Please tell us if there is another option to the previous question.

Response ID:9; z9da9NHbJd26tpa1pE Data

1. (untitled)

quota holdings

Bottom 25%

location

LM

owner/farm manager

Owner

production type

Free Run

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 3 Nothing dictating which quota is sold first: 5

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:5 Option 2:1 Option 3:5

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
Transfer to nieces and nephews
From grandparent to grandchild

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 3

12. Please tell us if there is another option to the previous question.

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:10; v1dgRRCREbmXudgbd1 Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Organic

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO) : 0 Nothing dictating which quota is sold first : 5

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:5 Option 3:1

- 6. Please tell us if there is another option to the previous question.
- 5. (untitled)
- 7. If there are changes to transfer assessments from this review, should the changes be $\frac{332}{332}$

applicable to all quota held?

No (Keep LIFO & 10/10/10 for issuances that occurred between 2005-2017)

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
From grandparent to grandchild
To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 10 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:11; Kgbxj9FWZ5eqcNrzN6 Data

1. (untitled)

quota holdings

Top 25%

location

LM

owner/farm manager

Owner

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

No

- 3. (untitled)
- 2. Do you think 10/10/10 should removed? Please see the website for some examples.

No

- 5. (untitled)
- 3. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

- 6. (untitled)
- 4. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling

From child to parent

From grandparent to grandchild

5. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

- 7. (untitled)
- 6. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:12; JZEveefN2oOaup42po Data

1. (untitled)

quota holdings

Top 25%

location

LM

owner/farm manager

Owner

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5 Nothing dictating which quota is sold first: 2

3. Please tell us if there is another option to the previous question.

Don't know

3. (untitled)

4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:0

Option 2:2

Option 3:5

6. Please tell us if there is another option to the previous question.

No

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
Transfer to nieces and nephews
From grandparent to grandchild
To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 10 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:13; 4dYXGkfOYjzRhY5oYZ Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Farm Manager

production type

Organic

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

- 2. (untitled)
- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 2 Nothing dictating which quota is sold first: 4

3. Please tell us if there is another option to the previous question.

None

- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:1

Option 2:2

Option 3:3

6. Please tell us if there is another option to the previous question.

Allow exceptions to 10/10/10 for succession farming and scenarios the support newer smaller operations. Stop giving grants to large farms.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

Transfer to nieces and nephews From grandparent to grandchild

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:14; 8b1omgsV1bgJUNP8NK Data

1. (untitled)

quota holdings

Bottom 25%

location

LM

owner/farm manager

New Entrant 2

production type

Organic

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

- 2. (untitled)
- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

Nothing dictating which quota is sold first: 5

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:1

Option 2:5

Option 3:3

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be

applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
Transfer to nieces and nephews
From grandparent to grandchild

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:15; nndknBu2XKWBuQNGQ2 Data

1. (untitled)

quota holdings

Bottom 25%

location

LM

owner/farm manager

Owner

production type

Organic

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

- 2. (untitled)
- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5 Nothing dictating which quota is sold first: 4

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

No

- 5. (untitled)
- 5. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

- 6. (untitled)
- 6. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

No, there should be no expansion to the policy for exempt transfers

- 7. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?
- 7. (untitled)
- 8. If LIFO or 10/10/10 are changed, should the NPP quota program be

subject to the same changes?

Response ID:16; XYI8GgIWBngDcBdaB1 Data

1. (untitled)

quota holdings

Top 25%

location

LM

owner/farm manager

Owner

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
Transfer to nieces and nephews
From grandparent to grandchild

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 7 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO) : 3 Nothing dictating which quota is sold first : 5

- 12. Please tell us if there is another option to the previous question.
- 9. (untitled)
- 13. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:17; OaQ0ZISRIQNLu0pX0w Data

1. (untitled)

quota holdings

Bottom 25%

location

INT

owner/farm manager

New Entrant 6

production type

Organic

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

No

- 3. (untitled)
- 2. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

- 4. (untitled)
- 3. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:5

Option 2:2

Option 3:5

- 4. Please tell us if there is another option to the previous question.
- 5. (untitled)
- 5. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

- 6. (untitled)
- 6. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling From grandparent to grandchild

7. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

- 7. (untitled)
- 8. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:18; xVd4kVlmdkqnF1bq1z Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Free Range

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:5

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

Nothing dictating which quota is sold first: 0

12. Please tell us if there is another option to the previous question.

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:19; JZEvjeTN2oOaup42po Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Farm Manager

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

2. (untitled)

- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.
- 4. (untitled)
- 5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

6. (untitled)

Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Response ID:20; IbdRbzIVIpw1UVvKVz Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Mixed Conventional & Specialty

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

- 2. (untitled)
- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

Nothing dictating which quota is sold first: 0

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

No

- 5. (untitled)
- 5. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

- 6. (untitled)
- 6. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
Transfer to nieces and nephews
From grandparent to grandchild

7. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

7. (untitled)

 $8. \, \text{If LIFO or } 10/10/10 \, \text{are changed, should the NPP quota program be subject to the same changes?}$

No

8. (untitled)

9. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO) : 3 Nothing dictating which quota is sold first : 5

10. Please tell us if there is another option to the previous question.

9. (untitled)

11. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:21; JZEveLsN2oOaup42po Data

1. (untitled)

quota holdings

Top 25%

location

LM

owner/farm manager

Owner

production type

Mixed Conventional & Specialty

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

Nothing dictating which quota is sold first: 5

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:5

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

No (Keep LIFO & 10/10/10 for issuances that occurred between 2005-2017)

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
Transfer to nieces and nephews
From grandparent to grandchild
To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 10 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:22; qWd9QpUQkg0GSqvRqm Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

- 2. (untitled)
- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

Nothing dictating which quota is sold first: 4

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

No

- 5. (untitled)
- 5. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

- 6. (untitled)
- 6. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From child to parent

- 7. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?
- 7. (untitled)
- 8. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

9. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

Nothing dictating which quota is sold first: 4

10. Please tell us if there is another option to the previous question.

9. (untitled)

11. Do you think 10/10/10 should be removed from the New Producer Program?

Yes

10. (untitled)

12. If yes, here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank them in order of preference (5 being most favored approach).

Please see the website for examples. The options are:

Option 1: No conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota, he/she is subject to: 1. a 100% claw back on all issuances that have been produced for less than 1 year; 2. Forfeiture of all future issuances for a period of 2 years.

Option 3:4

13. Please tell us if there is another option to the previous question.

Response ID:23; 1dLpdGcW04dncO1eOR Data

1. (untitled)

quota holdings

Bottom 25%

location

LM

owner/farm manager

Owner

production type

Free Run

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5

Nothing dictating which quota is sold first: 5

3. Please tell us if there is another option to the previous question.

There should be no FIFO or LIFO. FIRB should put a fair assessment policy in place that would apply to all supply managed commodity groups.

- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:5

Option 2:1

Option 3:1

6. Please tell us if there is another option to the previous question.

Please see answer to question 4

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
From grandparent to grandchild

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO) : 1 Nothing dictating which quota is sold first : 5

12. Please tell us if there is another option to the previous question.

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:24; 92krZ5iPkDOBuO0LOX Data

1. (untitled)

quota holdings

Bottom 25%

location

INT

owner/farm manager

Owner

production type

Free Run

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 0

3. Please tell us if there is another option to the previous question.

A PRORATED LAST IN FIRST OUT

- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:5

6. Please tell us if there is another option to the previous question.

PRORATED CLAWBACK 10/10

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
From grandparent to grandchild
To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 15 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Yes

Response ID:25; RbK3r2C5IQ8Eh5r85J Data

1. (untitled)

quota holdings

Top 25%

location

INT

owner/farm manager

Farm Manager

production type

Mixed Conventional & Specialty

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

2. (untitled)

- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.
- 4. (untitled)
- 5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

8. (untitled)

- 11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 12. Please tell us if there is another option to the previous question.

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

10. (untitled)

14. If yes, here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank them in order of preference (5 being most favored approach). Please see the website for examples. The options are:

Option 1: No conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota, he/she is subject to: 1. a 100% claw back on all issuances that have been produced for less than 1 year; 2. Forfeiture of all future issuances for a period of 2 years.

15. Please tell us if there is another option to the previous question.

Response ID:26; P3WqjPs15bP8iW5wWG Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

Nothing dictating which quota is sold first: 4

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 2:4

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

No (Keep LIFO & 10/10/10 for issuances that occurred between 2005-2017)

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
Transfer to nieces and nephews
From grandparent to grandchild

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Yes

Response ID:27; egong5UWxbBYcg48gw Data

1. (untitled)

quota holdings

Bottom 25%

location

LM

owner/farm manager

Owner

production type

Free Range

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

Nothing dictating which quota is sold first: 5

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 3:5

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling From child to parent

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Yes

Response ID:28; OaQ4rwURIQNLu0pX0G Data

1. (untitled)

quota holdings

Bottom 25%

location

LM

owner/farm manager

Owner

production type

Free Run

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

2. (untitled)

- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.
- 4. (untitled)
- 5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

8. (untitled)

- 11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 12. Please tell us if there is another option to the previous question.

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

10. (untitled)

14. If yes, here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank them in order of preference (5 being most favored approach). Please see the website for examples. The options are:

Option 1: No conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota, he/she is subject to: 1. a 100% claw back on all issuances that have been produced for less than 1 year; 2. Forfeiture of all future issuances for a period of 2 years.

15. Please tell us if there is another option to the previous question.

Response ID:29; RbK3j1f5lQ8Eh5r85J Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Free Run

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

- 2. (untitled)
- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

- 4. (untitled)
- 5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:4

Option 3:3

- 6. Please tell us if there is another option to the previous question.
- 5. (untitled)
- 7. If there are changes to transfer assessments from this review, should the changes be

applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

No, there should be no expansion to the policy for exempt transfers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Yes

Response ID:30; oLdVnOin8X6BfRomR8 Data

1. (untitled)

quota holdings

Middle 50%

location

INT

owner/farm manager

Owner

production type

Mixed Conventional & Specialty

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO) : 2 Nothing dictating which quota is sold first : 5

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:2 Option 3:5

- 6. Please tell us if there is another option to the previous question.
- 5. (untitled)
- 7. If there are changes to transfer assessments from this review, should the changes be

applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
Transfer to nieces and nephews
From grandparent to grandchild
To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Yes

Response ID:31; m2d12osbYkGwtmNGmz Data

1. (untitled)

quota holdings

Top 25%

location

LM

owner/farm manager

Owner

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

2. (untitled)

- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.
- 4. (untitled)
- 5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:32; m2d1boTbYkGwtmNGmz Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Free Range

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

Nothing dictating which quota is sold first: 5

3. Please tell us if there is another option to the previous question.

Let the free increase's be the last to be sold

- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:5

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be

applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling From child to parent

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 3

12. Please tell us if there is another option to the previous question.

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:33; wkd5NaT1JWvDikwvkP Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Farm Manager

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5 Nothing dictating which quota is sold first: 2

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 3:5

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be

applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
Transfer to nieces and nephews
From grandparent to grandchild
To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 10 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Yes

Response ID:34; ElakrnFWRZ4bc4ka4R Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Free Range

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 4 Nothing dictating which quota is sold first: 1

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:1 Option 2:1 Option 3:4

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
Transfer to nieces and nephews
From grandparent to grandchild

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO) : 4 Nothing dictating which quota is sold first : 1

12. Please tell us if there is another option to the previous question.

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:35; g4EQ4VfKI5GOUG4PGa Data

1. (untitled)

quota holdings

Bottom 25%

location

LM

owner/farm manager

Owner

production type

Free Range

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

2. (untitled)

- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Response ID:36; DVq1rXSBzx6vcNO2NB Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Organic

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

No

- 3. (untitled)
- 2. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

- 4. (untitled)
- 3. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 2:3

Option 3:3

- 4. Please tell us if there is another option to the previous question.
- 5. (untitled)
- 5. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

No (Keep LIFO & 10/10/10 for issuances that occurred between 2005-2017)

- 6. (untitled)
- 6. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
From grandparent to grandchild
Transfer to nieces and nephews
To long-standing farm managers

7. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 10 years as a full-time farm manager

7. (untitled)

8. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

- 9. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 10. Please tell us if there is another option to the previous question.
- 9. (untitled)
- 11. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:37; pQdRX5umo8OeFO8jOr Data

1. (untitled)

quota holdings

Bottom 25%

location

INT

owner/farm manager

New Entrant 5

production type

Organic

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 2:5

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

No (Keep LIFO & 10/10/10 for issuances that occurred between 2005-2017)

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
Transfer to nieces and nephews
From grandparent to grandchild
To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 15 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5

- 12. Please tell us if there is another option to the previous question.
- 9. (untitled)
- 13. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:38; qWd9NXUQkg0GSqvRqm Data

1. (untitled)

quota holdings

Top 25%

location

LM

owner/farm manager

Farm Manager

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

2. (untitled)

- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.
- 4. (untitled)
- 5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

8. (untitled)

- 11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 12. Please tell us if there is another option to the previous question.

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

Response ID:39; YK9NWQUG2XERhN0gNG Data

1. (untitled)

quota holdings

Bottom 25%

location

INT

owner/farm manager

Owner

production type

Free Run

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 1 Nothing dictating which quota is sold first: 4

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

No

- 5. (untitled)
- 5. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

No (Keep LIFO & 10/10/10 for issuances that occurred between 2005-2017)

- 6. (untitled)
- 6. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
From grandparent to grandchild

- 7. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?
- 7. (untitled)

8. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

8. (untitled)

9. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO) : 1 Nothing dictating which quota is sold first : 4

10. Please tell us if there is another option to the previous question.

This seems to be a repeat question

9. (untitled)

11. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:40; QmYamzskJQmjhRQZRg Data

1. (untitled)

quota holdings

Bottom 25%

location

LM

owner/farm manager

Owner

production type

Organic

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

No

- 3. (untitled)
- 2. Do you think 10/10/10 should removed? Please see the website for some examples.

No

- 5. (untitled)
- 3. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

No (Keep LIFO & 10/10/10 for issuances that occurred between 2005-2017)

- 6. (untitled)
- 4. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling

From child to parent

From grandparent to grandchild

5. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

- 7. (untitled)
- 6. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Yes

Response ID:41; 0dn1GvUO0bg8hg2bg9 Data

1. (untitled)

quota holdings

Bottom 25%

location

INT

owner/farm manager

New Entrant 1

production type

Organic

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

- 2. (untitled)
- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

- 4. (untitled)
- 5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:1

Option 3:5

- 6. Please tell us if there is another option to the previous question.
- 5. (untitled)
- 7. If there are changes to transfer assessments from this review, should the changes be

applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
Transfer to nieces and nephews
From grandparent to grandchild
To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 7 years as a full-time farm manager Other - Write In: 5 years

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

- 11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 12. Please tell us if there is another option to the previous question.

100% ownership in the first year to gain borrowing equity. Non-transferrable other than to family members for 10 years, then follows the same class/principals as regular quota

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

Yes

10. (untitled)

14. If yes, here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank them in order of preference (5 being most favored approach).

Please see the website for examples. The options are:

Option 1: No conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota, he/she is subject to: 1. a 100% claw back on all issuances that have been produced for less than 1 year; 2. Forfeiture of all future issuances for a period of 2 years.

Option 3:5

15. Please tell us if there is another option to the previous question.

I think NPP should gain 100% equity in the first year to increase borrowing power but 100% clawback if sold inside 10 years. After 10 years of production should be treated 0/95/2

Response ID:42; 92kraeUPkDOBuO0LOX Data

1. (untitled)

quota holdings

Middle 50%

location

VΙ

owner/farm manager

Owner

production type

Mixed Specialty

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

- 2. (untitled)
- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

- 4. (untitled)
- 5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 2:0

Option 3:5

- 6. Please tell us if there is another option to the previous question.
- 5. (untitled)
- 7. If there are changes to transfer assessments from this review, should the changes be

applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
Transfer to nieces and nephews
From grandparent to grandchild
To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 15 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:43; DVq1j3SBzx6vcNO2NB Data

1. (untitled)

quota holdings

Middle 50%

location

VΙ

owner/farm manager

Owner

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
From grandparent to grandchild
To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 10 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5

12. Please tell us if there is another option to the previous question.

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:44; 6P6d5bU16N23ieNDe5 Data

1. (untitled)

quota holdings

Top 25%

location

INT

owner/farm manager

Owner

production type

Mixed Conventional & Specialty

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

No

- 3. (untitled)
- 2. Do you think 10/10/10 should removed? Please see the website for some examples.

No

- 5. (untitled)
- 3. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Response ID:45; YK9Nj5HG2XERhN0gNG Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 4 Nothing dictating which quota is sold first: 5

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 2:1 Option 3:5

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be

applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
From grandparent to grandchild
To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 10 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:46; XYI8eRHWBngDcBdaB1 Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Free Run

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

- 2. (untitled)
- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 4 Nothing dictating which quota is sold first: 4

3. Please tell us if there is another option to the previous question.

I prefer FIFO

- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

No

- 5. (untitled)
- 5. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

- 6. (untitled)
- 6. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
From grandparent to grandchild
To long-standing farm managers

7. If you selected "Farm Managers" above, what qualifications should the 401

farm manager meet to be eligible for the transfer?

At least 15 years as a full-time farm manager

7. (untitled)

 $8.\, \text{If LIFO}$ or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:47; v1dgQmfREbmXudgbd1 Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Farm Manager

production type

Free Range

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Response ID:48; L52Z54fY1j83hewbe4 Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Organic

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 3 Nothing dictating which quota is sold first: 5

3. Please tell us if there is another option to the previous question.

3. (untitled)

4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:5 Option 2:2

Option 3:3

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
From grandparent to grandchild
To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 7 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 3 Nothing dictating which quota is sold first: 5

12. Please tell us if there is another option to the previous question.

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

Yes

10. (untitled)

14. If yes, here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank them in order of preference (5 being most favored approach). Please see the website for examples. The options are:

Option 1: No conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota, he/she is subject to: 1. a 100% claw back on all issuances that have been produced for less than 1 year; 2. Forfeiture of all future issuances for a period of 2 years.

Option 2:5 Option 3:2 15. Please tell us if there is another option to the previous question.

Response ID:49; B156rJIZbJnvTRaERq Data

1. (untitled)

quota holdings

Bottom 25%

location

LM

owner/farm manager

Farm Manager

production type

Organic

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Response ID:50; rYdzb1TJne0vsN23N0 Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Mixed Conventional & Specialty

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Response ID:51; xVd4N0HmdkqnF1bq1z Data

1. (untitled)

quota holdings

Top 25%

location

LM

owner/farm manager

Owner

production type

Mixed Specialty

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 2 Nothing dictating which quota is sold first: 5

3. Please tell us if there is another option to the previous question.

Back in the day..... just man to man dealings on quota dealings worked real well I thought. If you didn't get involved.... u missed out

3. (untitled)

4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:5 Option 2:2

6. Please tell us if there is another option to the previous question.

No conditions

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
Transfer to nieces and nephews
From grandparent to grandchild
To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 7 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

- 8. (untitled)
- 11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 12. Please tell us if there is another option to the previous question.

If this last question pertains to NPP then I have to say they are held captive by 10/10/10. If otherwise, then zero restrictions.

- 9. (untitled)
- 13. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:53; 5dKD94iOKpmZhWxNWv Data

1. (untitled)

quota holdings

Bottom 25%

location

LM

owner/farm manager

Owner

production type

Free Run

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 0

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.
- 4. (untitled)
- 5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Response ID:54; GzmGz1Hengwlu3aO3j Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Free Range

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

No

- 3. (untitled)
- 2. Do you think 10/10/10 should removed? Please see the website for some examples.

No

- 5. (untitled)
- 3. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

- 6. (untitled)
- 4. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

No, there should be no expansion to the policy for exempt transfers

5. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

- 7. (untitled)
- 6. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:56; 8b1jxJUV1bgJUNP8NQ Data

1. (untitled)

quota holdings

Top 25%

location

LM

owner/farm manager

Owner

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

No

- 3. (untitled)
- 2. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

- 4. (untitled)
- 3. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:2 Option 2:5

4. Please tell us if there is another option to the previous question.

- 5. (untitled)
- 5. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

- 6. (untitled)
- 6. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From grandparent to grandchild

7. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

7. (untitled)

8. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

9. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5

10. Please tell us if there is another option to the previous question.

9. (untitled)

11. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:58; egonx5cWxbBYcg48gw Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Farm Manager

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

- 2. (untitled)
- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

Nothing dictating which quota is sold first: 5

3. Please tell us if there is another option to the previous question.

None

- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

No

- 5. (untitled)
- 5. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

- 6. (untitled)
- 6. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling From child to parent

- 7. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?
- 7. (untitled)

 $8.\,lf$ LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:59; RbK3E1C5IQ8Eh5r85J Data

1. (untitled)

quota holdings

Middle 50%

location

INT

owner/farm manager

Owner

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

- 2. (untitled)
- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5

3. Please tell us if there is another option to the previous question.

Would prefer FIFO

- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

No

- 5. (untitled)
- 5. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

- 6. (untitled)
- 6. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling From child to parent

7. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

7. (untitled)

 $8.\,lf$ LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:60; Data

1. (untitled)

quota holdings

location

owner/farm manager

production type

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

No

- 3. (untitled)
- 2. Do you think 10/10/10 should removed? Please see the website for some examples.

No

- 5. (untitled)
- 3. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

No (Keep LIFO & 10/10/10 for issuances that occurred between 2005-2017)

(untitled)

Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Response ID:61; ZGzpY2sKnv5kU42p4n Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

No

- 3. (untitled)
- 2. Do you think 10/10/10 should removed? Please see the website for some examples.

No

- 5. (untitled)
- 3. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

No (Keep LIFO & 10/10/10 for issuances that occurred between 2005-2017)

- 6. (untitled)
- 4. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling

From child to parent

From grandparent to grandchild

5. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

- 7. (untitled)
- $6. ext{ If LIFO or } 10/10/10 ext{ are changed, should the NPP quota program be subject to the same changes?}$

No

- 8. (untitled)
- 7. Here are options that meet the SAFETI principles with which we could replace LIFO.

Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5

- 8. Please tell us if there is another option to the previous question.
 - old producer must be in the industry for at least 10 years . i mean any supply management in bc.
- 9. (untitled)
- 9. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:62; 0dnNedIO0bg8hg2bgr Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 3 Nothing dictating which quota is sold first: 5

3. Please tell us if there is another option to the previous question.

A simplified version with no strings attached. Quota can flow to who wants it, and if the market shrinks, it gets taken back.

3. (untitled)

4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1 : 5 Option 2 : 1

Option 3:3

6. Please tell us if there is another option to the previous question.

Simpler the better.

6. (untitled)

7. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
Transfer to nieces and nephews
From grandparent to grandchild
To long-standing farm managers

8. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

7. (untitled)

9. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:63; g4EQ0LsKI5GOUG4PGa Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 3. Please tell us if there is another option to the previous question.

Response ID:64; WWV0LITQw98VSXNYXj Data

1. (untitled)

quota holdings

Bottom 25%

location

LM

owner/farm manager

Owner

production type

Mixed Conventional & Specialty

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

No

- 3. (untitled)
- 2. Do you think 10/10/10 should removed? Please see the website for some examples.

No

- 5. (untitled)
- 3. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

- 6. (untitled)
- 4. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

No, there should be no expansion to the policy for exempt transfers

- 5. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?
- 7. (untitled)
- 6. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:65; Data

1. (untitled)

quota holdings

location

owner/farm manager

production type

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

Nothing dictating which quota is sold first: 5

3. Please tell us if there is another option to the previous question.

3. (untitled)

4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:5

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
Transfer to nieces and nephews
From grandparent to grandchild
To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 7 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:66; egonEOcWxbBYcg48gw Data

1. (untitled)

quota holdings

Top 25%

location

LM

owner/farm manager

Farm Manager

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5 Nothing dictating which quota is sold first: 3

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:5 Option 2:3 Option 3:4

6. Please tell us if there is another option to the previous question.

Pro Rata

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
From grandparent to grandchild

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5 Nothing dictating which quota is sold first: 4

12. Please tell us if there is another option to the previous question.

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:67; xVd4Y0ImdkqnF1bq1z Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Mixed Conventional & Specialty

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

No

- 3. (untitled)
- 2. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

- 4. (untitled)
- 3. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 2:3

Option 3:2

4. Please tell us if there is another option to the previous question.

You could look at a one sale of quota not more then 25% which would only have the claw back of 5% to 10%. Whih that you could only do that 1 time per every 15 years, or something along that line. If they would sell anymore or before the 15 years then they would pay the claw back penalty.

- 5. (untitled)
- 5. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

- 6. (untitled)
- 6. Should the policy around exempt transfers be expanded to include any of the

following?

Please check all that apply.

From sibling to sibling

From child to parent

From grandparent to grandchild

Other - Write In: Farm Managers is a tricky one. It could fall under a flat rate clawback ro a min % onwership.

7. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 15 years as a full-time farm manager

Other - Write In: Farm Managers is a tricky one. It could fall under a flat rate clawback ro a min % onwership. Should this also include land holdings?

7. (untitled)

8. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:68; kmd6pVskx54VhmRlmn Data

1. (untitled)

quota holdings

Middle 50%

location

VΙ

owner/farm manager

Owner

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

No

- 3. (untitled)
- 2. Do you think 10/10/10 should removed? Please see the website for some examples.

No

- 5. (untitled)
- 3. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

No (Keep LIFO & 10/10/10 for issuances that occurred between 2005-2017)

- 6. (untitled)
- 4. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

No, there should be no expansion to the policy for exempt transfers

- 5. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?
- 7. (untitled)
- $_{6.}$ If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

- 8. (untitled)
- 7. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5

- 8. Please tell us if there is another option to the previous question.
- 9. (untitled)
- 9. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:69; NqLJG9i3BvqdFZ3OZK Data

1. (untitled)

quota holdings

Bottom 25%

location

LM

owner/farm manager

New Entrant 3

production type

Organic

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

2. (untitled)

- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Response ID:70; 4dYXdkCOYjzRhY5oYZ Data

1. (untitled)

quota holdings

Bottom 25%

location

LM

owner/farm manager

Owner

production type

Enriched

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO) : 4 Nothing dictating which quota is sold first : 3

3. Please tell us if there is another option to the previous question.

Response ID:71; Data

1. (untitled)

quota holdings

location

owner/farm manager

production type

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

Please tell us if there is another option to the previous question.

Response ID:72; dZmEXocQxRzgSZ3xZ6 Data

1. (untitled)

quota holdings

Bottom 25%

location

LM

owner/farm manager

New Entrant 10

production type

Organic

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5 Nothing dictating which quota is sold first: 3

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:5 Option 3:3

- 6. Please tell us if there is another option to the previous question.
- 5. (untitled)
- 7. If there are changes to transfer assessments from this review, should the changes be

applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From grandparent to grandchild To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 10 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:73; ZGzpG2SKnv5kU42p4n Data

1. (untitled)

quota holdings

Bottom 25%

location

VΙ

owner/farm manager

Farm Manager

production type

Free Range

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 4 Nothing dictating which quota is sold first: 3

3. Please tell us if there is another option to the previous question.

I like the 50/2/5

- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:5

Option 2:0

Option 3:4

6. Please tell us if there is another option to the previous question.

I do like option 3, however it doesn't work in a year where there are no increases, and it certainly doesn't work if there are claw-backs. I believe no conditions with the board always retaining 5% is the best way to go.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
Transfer to nieces and nephews
From grandparent to grandchild

To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 10 years as a full-time farm manager

Other - Write In: Farm manager has shown comitment to the industry and must operate under the same rules as NPP holders, so cannot transfer quota for 10yrs. Actually, that really should be the same for all transfers without assements

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5 Nothing dictating which quota is sold first: 4

12. Please tell us if there is another option to the previous question.

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:74; Data

1. (untitled)

quota holdings

location

owner/farm manager

production type

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

2. (untitled)

- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.
- 4. (untitled)
- 5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

6. Please tell us if there is another option to the previous question.

5. (untitled)

- 7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?
- 6. (untitled)
- 8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

- 9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?
- 7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

8. (untitled)

- 11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 12. Please tell us if there is another option to the previous question.

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

Yes

10. (untitled)

If yes, here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank them in order of preference (5 being most favored approach). Please see the website for examples. The options are:

Option 1: No conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota, he/she is subject to: 1. a 100% claw back on all issuances that have been produced for less than 1 year; 2. Forfeiture of all future issuances for a period of 2 years.

Please tell us if there is another option to the previous question.

Response ID:75; XYI8jRSWBngDcBdaB1 Data

1. (untitled)

quota holdings

Top 25%

location

LM

owner/farm manager

Farm Manager

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

- 2. (untitled)
- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 0

Nothing dictating which quota is sold first: 0

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

No

- 5. (untitled)
- 5. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

No (Keep LIFO & 10/10/10 for issuances that occurred between 2005-2017)

- 6. (untitled)
- 6. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From grandparent to grandchild
To long-standing farm managers

7. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

7. (untitled)

 $8.\,\mathrm{lf}$ LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:76; Data

1. (untitled)

quota holdings

location

owner/farm manager

production type

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5

3. Please tell us if there is another option to the previous question.

3. (untitled)

4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 3:5

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

Please tell us if there is another option to the previous question.

Response ID:77; Data

1. (untitled)

quota holdings

location

owner/farm manager

production type

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO) : 5 Nothing dictating which quota is sold first : 5

3. Please tell us if there is another option to the previous question.

3. (untitled)

4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 3:5

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the

following?

Please check all that apply.

From sibling to sibling

No, there should be no expansion to the policy for exempt transfers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5 Nothing dictating which quota is sold first: 1

12. Please tell us if there is another option to the previous question.

ny given quota should no be able to be sold for ten years unless it is part of a complete farm sale

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:78; Data

1. (untitled)

quota holdings

location

owner/farm manager

production type

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 3:5

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

No

8. (untitled)

11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5

12. Please tell us if there is another option to the previous question.

any given quota should not be sold for 10 years unless it is a farm sale

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

No

Response ID:79; Data

1. (untitled)

quota holdings

location

owner/farm manager

production type

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 0

3. Please tell us if there is another option to the previous question.

3. (untitled)

4. Do you think 10/10/10 should removed? Please see the website for some examples.

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

8. (untitled)

- 11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 12. Please tell us if there is another option to the previous question.

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

10. (untitled)

14. If yes, here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank them in order of preference (5 being most favored approach). Please see the website for examples. The options are:

Option 1: No conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota, he/she is subject to: 1. a 100% claw back on all issuances that have been produced for less than 1 year; 2. Forfeiture of all future issuances for a period of 2 years.

15. Please tell us if there is another option to the previous question.

Response ID:83; m2d1evsbYkGwtmNGmz Data

1. (untitled)

quota holdings

Middle 50%

location

LM

owner/farm manager

Owner

production type

Caged

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 4 Nothing dictating which quota is sold first: 2

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 2:2

Option 3:4

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be $\frac{454}{54}$

applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From grandparent to grandchild
To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 10 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:84; XYIQOJhWBngDcBdaB8 Data

1. (untitled)

quota holdings

Bottom 25%

location

LM

owner/farm manager

New Entrant 8

production type

Organic

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 4 Nothing dictating which quota is sold first: 2

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 2:1 Option 3:4

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be

applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

Transfer to nieces and nephews From grandparent to grandchild To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 10 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:85; 5dKDdKiOKpmZhWxNWv Data

1. (untitled)

quota holdings

Bottom 25%

location

INT

owner/farm manager

Owner

production type

Free Range

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 5 Nothing dictating which quota is sold first: 4

- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 1:4 Option 3:5

- 6. Please tell us if there is another option to the previous question.
- 5. (untitled)
- 7. If there are changes to transfer assessments from this review, should the changes be $\frac{458}{500}$

applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
From grandparent to grandchild
To long-standing farm managers

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 15 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

Response ID:86; QmYarzHkJQmjhRQZRg Data

1. (untitled)

quota holdings

Bottom 25%

location

LM

owner/farm manager

Owner

production type

Organic

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

2. (untitled)

- 2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 3. Please tell us if there is another option to the previous question.
- 3. (untitled)
- 4. Do you think 10/10/10 should removed? Please see the website for some examples.

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

8. (untitled)

- 11. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).
- 12. Please tell us if there is another option to the previous question.

9. (untitled)

13. Do you think 10/10/10 should be removed from the New Producer Program?

Response ID:87; DVq1VXSBzx6vcNO2NB Data

1. (untitled)

quota holdings

Bottom 25%

location

VΙ

owner/farm manager

Owner

production type

Free Range

1. Do you think LIFO (Last In First Out) should be removed? Please see the website for some examples.

Yes

2. (untitled)

2. Here are options that meet the SAFETI principles with which we could replace LIFO. Please see the website for some examples. Please rank them in order of preference (5 being most favored approach).

First In First Out (FIFO): 4 Nothing dictating which quota is sold first: 2

3. Please tell us if there is another option to the previous question.

3. (untitled)

4. Do you think 10/10/10 should removed? Please see the website for some examples.

Yes

4. (untitled)

5. Here are options that meet the SAFETI principles with which we could replace 10/10/10. Please rank those you would support in order of preference (5 being most favored approach). Please see the website for some examples.

The options are:

Option 1: No Conditions

Option 2: Replace with 10/10/5

Option 3: 0/95/2 – All issuances must be produced for a minimum of 1 year to gain 95% ownership. If a producer decides to sell quota he/she is subject to: 1. A 100% claw back on all issuances that have been produced for less than 1 year producer 2. Forfeiture of all future issuances for a period of 2 years.

Option 3:4

Option 1:5

Option 2:3

6. Please tell us if there is another option to the previous question.

5. (untitled)

7. If there are changes to transfer assessments from this review, should the changes be applicable to all quota held?

Yes

6. (untitled)

8. Should the policy around exempt transfers be expanded to include any of the following?

Please check all that apply.

From sibling to sibling
From child to parent
Transfer to nieces and nephews
From grandparent to grandchild

9. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

At least 10 years as a full-time farm manager

7. (untitled)

10. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

From sibling to sibling

7. If you selected "Farm Managers" above, what qualifications should the farm manager meet to be eligible for the transfer?

Not Applicable

7. (untitled)

8. If LIFO or 10/10/10 are changed, should the NPP quota program be subject to the same changes?

AMENDING ORDER #019 TO THE CONSOLIDATED ORDER OF MAY 12, 2010

MADE BY THE BRITISH COLUMBIA EGG MARKETING BOARD ON DATE TBD

The British Columbia Egg Marketing Board orders as follows:

1. PART 1 - INTRODUCTORY, Section 2, Interpretation to the Consolidated Order of May 12, 2010 is amended by adding the following:

"Longstanding Farm Manager" means Person who has been employed by a Registered Producer for a period of ten (10) or more consecutive years where the income received for services rendered on farm represents the Persons primary source of income.

"Reserve" means regular layer quota that is accumulated by Board through either assessments on non-exempt transfers or portions of provincial allocations that have not been allocated to Registered Producers or New Entrants

- 2. PART IV TRANSFER OF LAYER QUOTA, Section 13, Surrender of Layer Quota on Transfer, to the Consolidated Order of May 12, 2010 is amended by replacing it with the following:
 - 13. (1) Subject to subsection (5), where Layer Quota is Transferred, the Transferor shall surrender to the Board an amount of Layer Quota calculated as 5% of the amount of Layer Quota being Transferred;
 - (2) Any quota issued by the board to producers after September 1, 2005 through the New Producer Program will be subject to a declining transfer assessment. The amount retracted declines by 10% per annum after year one, until it reaches the minimum assessment detailed in 13(1)(a) in year eleven and beyond. The schedule is as follows:

Day 1 to day 364	100% reverts to the
	Board
Day 365 to 2 nd anniversary date	90% reverts to the
	Board
After Year 3 anniversary	80% reverts to the
	Board
After Year 4 anniversary	70% reverts to the

	Board
After Year 5 anniversary	60% reverts to the
	Board
After Year 6 anniversary	50% reverts to the
-	Board
After Year 7 anniversary	40% reverts to the
-	Board
After Year 8 anniversary	30% reverts to the
	Board
After Year 9 anniversary	20% reverts to the
	Board
After Year 10 anniversary	10% reverts to the
	Board
After Year 11 anniversary and	Regular assessment
beyond	rules apply

- (a) where such Layer Quota was Issued through the New Producer Program to the Transferor on or after January 1, 2020, 100% of the amount of Layer Quota being Transferred is subject to assessments until after the Year 10 anniversary, at which time the minimum assessment detailed in 13(1)(a) applies
- (3) Where the proportionate interest of a Producer in a partnership is increased, decreased or transferred, a proportionate Transfer of the Layer Quota deemed to have been Issued to such Producer is deemed to occur.
- (4) Where the proportionate direct or indirect interest of an individual in a corporate Producer is increased, decreased or transferred, a proportionate Transfer of the Layer Quota deemed to have been Issued to such individual is deemed to occur.
- (5) A surrender of Layer Quota pursuant to paragraph 13(1)(a) is not required where:
 - (a) Layer Quota is Transferred, or deemed to have been Transferred, to the Transferor's parent, sibling, spouse, child, or child and the child's spouse, grandchild, niece or nephew;
 - (b) Layer Quota is Transferred among Related Corporate Producers:
 - (c) Layer Quota is Transferred to the Transferors Longstanding Farm Manager who meets the criteria defined in 13(6)
 - (e) Layer Quota is Transferred by way of a Permissible Lease;
 - (f) one or more Producers Transfer Layer Quota to a corporate Producer and the direct or indirect interest of each such Transferor in

the corporate Producer is proportionate to the Layer Quota so Transferred by each such Transferor;

- (g) two or more Producers enter into an agreement of partnership and the partnership interest of each such Producer is proportionate to the Layer Quota registered in that Producer's name;
- (h) the amount of Layer Quota deemed to have been Issued to a Producer having an interest in a partnership remains registered in that Producer's name upon dissolution of the partnership.
- (6) Pursuant to paragraph 13(5)(c) to qualify as a Long Standing Farm Manager:
 - (a) Must provide a minimum of seven (7) years tax records that details the Long Standing Farm Managers income earned from employment at Transferors farm as the primary source of income in each year submitted; and
 - (b) Proof of current employment as Long Standing Farm Manager with the Transferor: and
 - (c) Be approved by a motion from the Board of Directors.
- 3. This Order comes into effect DATE TBD.

DATED at Abbotsford, British Columbia, on DATE TBD

BRITISH COLUMBIA EGG MARKETING BOARD

Brad Bond, Chair	



BC Egg Marketing Board

Strategic Plan 2015 - 2020

2



Size Up



- Our system of Producers, Graders, and regulations allows us the flexibility to align production with consumer expectations
- We have been able to get our staff aligned and on the same page with the Board
- **3.** Transparency and communication are improving
- **4.** We have very good financial stability as an organization
- 5. We have been able to establish successful pricing protocols, including a system that prices specialty eggs

Top Ranked Weaknesses

- 1. We lack the necessary level of openness and transparency needed to build and maintain trust with Producers and Stakeholders, plus we lack effective communication with Producers and Stakeholders
- 2. We have not succeeded in convincing other provincial egg boards to price specialty eggs
- 3. We have not been able to create a demand model for identifying consumer needs and a system that can respond to changes in market demand in a timely way
- Our database needs to be more robust in order to enhance utilization and decision making.
- 5. We have not been vigilant in monitoring and enforcing our consolidated orders

Top Ranked Opportunities

- Overall growth in consumer desire for and consumption of eggs
- Growing desire of consumers to understand where the food they eat comes from geographically
- Growing desire of consumers to understand how the food they eat is produced
- 4. Growing trend of people to seek information on-line that informs their purchase decisions
- **5.** Growth in demand for eggs in further processing
- Producers need better information to allow them to make the call on what/how to shift their production
- 7. The work of Producers is becoming more and more complex more labour intensive ways of farming, more record keeping and they need help to build skills and navigate this change in order to achieve understanding and compliance of the system

Top Ranked Threats

- A lack of supply of eggs to meet Domestic demand will create pressure for imports entering our market
- Potential for future AI outbreaks with devastating impact on the industry and ongoing local consumer demand
- Upstream governing bodies lack a sufficient future focus to meet market needs – threatening our relevance
- 4. That a non-licensed egg producer results in food safety or bio-security issues damaging the reputation of the industry
- Provinces/EFC is too slow to provide leadership on issues like animal welfare

 and we lose our social license



Mission, Vision, Values

Our Vision

A cohesive and sustainable growing BC egg industry that meets the needs of consumers while being socially and environmentally responsible.

Our Mission...

To engage stakeholders to meet the demands of the marketplace:

- Making principle based decisions according to SAFETI guidelines
- Building trust through transparency
- Providing high value support to members, helping them thrive in the face of change
- Continuing to build our social license and raising the standards on health, safety and sustainability

Our Values

- Being accountable
- Doing all things with excellence
- Having respectful & caring relationships
- Being transparent in everything that we do
- Being supportive to supply management



Based on the Ranked SWOT's we have identified the following seven "Strategic Imperatives" – i.e. the seven big things we are seeking to achieve over the next five years.

- Building trust through greater transparency and engagement with stakeholders
 Becoming the preferred go-to resource for Producers seeking to grow and improve their business
 More powerfully marketing eggs to meet the evolving desires of consumers
 Being a driving force to better match supply and demand in the industry
 Taking leadership in setting standards and ensuring compliance fundamental to our social license
 Finding a win-win solution to meet the needs of Further
- 7. Sustaining and extending our successful pricing model

For each of these imperatives, the notes on the following pages capture:

• The underlying SWOT issues that speak to the need for this work

Processors and their customers

- The specific, measurable objective we are striving for i.e. what success looks like
- The strategies (actions and investments) we will employ in order to achieve the objective



SI #1

Building trust through greater transparency and engagement with Stakeholders

Underlying SWOT issues:



Transparency and communication are improving

- We have been able to get our staff aligned and on the same page with the Board
- We have very good financial stability as an organization
- We have not been vigilant in monitoring and enforcing our consolidated orders

Objectives	Strategies & Actions
Objective 1.1 To have FIRB satisfied with our level of transparency, as measured by it ceasing to be an issue in our relationship, by Dec. 31, 2016 Objective 1.2 To achieve high levels of satisfaction with our members and stakeholders, as measured through our annual survey (targets tbd until we have our benchmarks): a. satisfaction on transparency and engagement b. confidence in quality of the work of our staff c. timeliness of information d. trust	 Complete an initial benchmarking survey early in 2016 Develop a transparency plan to identify the things we need to share openly Step up our communication around compliance – educate producers – not assuming that they know Establish a calendar of the engagement events through the year – moving away from ad hoc interaction and into a formalized process Achieve a minimum of four verbal or in person touch points per Producer per year
Objective 1.3 To achieve high levels of satisfaction with our staff members, as measured through our annual survey	Develop a Staff Engagement Strategy to create the conditions of high job satisfaction Measure staff member satisfaction

6



SI #1 (cont.)

Building trust through greater transparency and engagement with stakeholders

Objectives	Strategies & Actions
Objective 1.4 To achieve a high level of Board member satisfaction with the work of staff, as measured through ongoing reviews	Ensure that Board Members have all the information they need in their package to make decisions – the Board will measure how well we do on that front after each meeting:
	 Improve the level of preparation of the Board Package – more detailed and accurate information Be more disciplined in what gets on the the agenda and send out the agenda earlier for Board feedback Establish a standard briefing note format for issues to be put forward from staff to board
	2. Insert questions into COMB BOD review survey
	3. Perform quarterly reviews
	4. Ensure that we have the right people in the right seats
Objective 1.5 To achieve and sustain a high level of producer compliance to board policies and to staff administration of these policies	Develop and put in place a policy and procedure binder
	Revisit the disincentives currently in place to encourage compliance
	3. Establish benchmarks for producer compliance



SI #2

Becoming a preferred go-to resource for Producers seeking to grow and improve their business

Underlying SWOT issues:

- Producers need better information to allow them to make the call on what/how to shift their production
- Egg Production is becoming more and more complex more labour intensive ways of farming, more record keeping and they need help to build skills and navigate this change in order to achieve understanding and compliance of the system
- Our system (combination of willing producers & graders, our regulations) allows the flexibility to align production with consumer expectations
- We lack insight into who our Producers/constituents are, what production levels they have, what facilities they have, where they want to take their business etc. preventing us from increasing utilization and meeting consumer demand

Objectives	Strategies & Actions
Objective 2.1 To achieve strong ratings in our ongoing annual survey of producers on the extent of: a. the quality and utilization of BCEMB programs b. BCEMB providing valuable insight and tools to inform their production decisions	 Complete initial benchmarking survey in early 2016 Make a significant investment to refresh our current practices through education/workshops — go to the producers rather than waiting for them to come to us: Include a train the trainer component where needed Include workshops on emerging changes — e.g. animal care program Invest in multiple mediums for delivering our critical information Invest in building the relationship with stakeholders — using an ADKAR lens to help us improve change management Invest in creating a system that will produce an accurate picture of the state the industry: Invest in aggregating the data on barn space, equipment etc.



SI#3

More powerfully market eggs to meet the evolving desires of consumers

Underlying SWOT issues:

- Overall growth in consumer desire for and consumption of eggs
- Growing desire of consumers to understand where the food they eat comes from geographically
- Growing desire of consumers to understand how the food they eat is produced
- Growing trend of people to seek information on-line that informs their purchase decisions

Objectives	Strategies & Actions
Objective 3.1 To increase the per capita consumption of BC eggs over the life of the strategic plan	Gather initial benchmarks on key public opinion points (key to identify the right research firm)
Objective 3.2 To have a better informed consumer who: a. places a premium value on a BC egg over other eggs — BC eggs are their egg of choice b. is well informed on key messages relating to BC eggs (organic, caged etc.)	 2. Invest in a public education program regarding the brand and what it represents – geography, BC production methods, sustainability etc. 3. Invest in search engine optimization to take a lead position in the dissemination of information - we come up first in search
to be eggs (organic, caged etc.)	results with accessible information 4. Invest in understanding why consumers come to our site today



SI #3 (cont.)

More powerfully market eggs to meet the evolving desires of consumers

Objectives	Strategies & Actions
Objective 3.3 To have a BC egg stamping program in place:	Research provinces who are already stamping eggs
a. with first quality Grader by June 30, 2016b. universally by Dec. 31, 2016 – or sooner	2. Establish the stamping strategy for the long term:
	 Regional stamping etc. Other stamping allowable by Graders Understanding the cost implications and funding
	3. Lobby BC government (as per Quebec) for the regulatory requirements for stamping of BC eggs:
	 Be proactive in establishing what stamping needs to look like before the industry fills the void with their own solutions Appeal to the government on this as a measure for delivering Food Safety etc.
	4. In the meantime, move quickly to implement stamping with the graders who are already prepared to do so; if we can get one grader on the program, the pressure will be on others to follow:
	Requires us to have our grader audit program ready to support this



SI #4

Being a driving force to better match supply and demand in the industry

Underlying SWOT issues:

- A lack of supply of eggs to meet domestic demand will create pressure for imports entering our market
- Upstream governing bodies lack a sufficient future focus to meet market needs threatening our relevance



We have not been able to create a demand model for identifying consumer needs and a system that can respond to changes in market demand in a timely way

Objectives	Strategies & Actions
Objective 4.1 To close the importation gap (US, Interprovincial) in BC – reduce US imports to the maximum allowed by trade agreements	 Invest to create an effective demand forecasting model provincially, by egg type and production method: Encourage EFC to have a forecasting
and eliminate interprovincial imports over the life of the strategy	model by province (start with sharing ours)
Objective 4.2 To increase and sustain our utilization rate to the maximum allowable (currently 100%) by Dec. 31, 2017	Refresh our production forecasting model, finding ways to create the utilization rate and encourage increased production

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SI #4 (cont.)

Being a driving force to better match supply and demand in the industry

Objectives	Strategies & Actions
Objective 4.3 To shorten the time between quota allocation and FIRB approval, to be within 30 days by June 30, 2016	 Invest in building trust between BC Egg and FIRB on our governance, asking them to pre-approve our allocation model and speed up the approval process: Speak to the SAFETI model
	2. Invest time to help EFC and FPCC reach a common understanding:
	 Maintain pressure and keep noise level high Encourage EFC to undertake a stakeholder satisfaction survey by province – including their transparency Keep pushing for the opening up of the Federal-Provincial Agreement Develop a white paper with suggested solutions
	3. Lobby more actively with the BC FPCC member:
	Get the real numbers on the table
	4. Lobby the Minister of Agriculture in BC to press the Federal Minister – with caution
	5. Executive Director to invest more time in working actively with his counterparts in other provinces (Ontario and western provinces) so that there is a stronger, more coherent voice on these issues



SI #5

Taking
leadership
in setting
standards
and ensuring
compliance –
fundamental
to our social
license

Underlying SWOT issues:

- Potential for future Al outbreaks with devastating impact on the industry and ongoing local consumer demand
- That an non-licensed egg producer results in food safety or bio-security issues damaging the reputation of the industry
- Provinces/EFC is too slow to provide leadership on issues like animal welfare and we lose our social license
- We have not been vigilant in monitoring and enforcing our consolidated orders

Objectives Strategies & Actions Objective 5.1 1. Use policy tools to encourage dispersal of farms beyond the Fraser Valley, to lower To have a comprehensive AI capacity in place the potential impact of an Al outbreak by December 31, 2016, as measured by: 2. Work proactively to establish clear a. achieving a high level of compliance on all protocols that all parties agree to biosecurity protocols **b.** ensuring that any AI event has minimal 3. Invest to ensure protocols are in place, impact on the industry - fully contained allowing those dealing with the disease within the originating farm to move faster: · Manage the kill · Compost the birds · Disinfect, etc. 4. Extend the Emergency Preparedness Program to regions outside the Fraser Valley 5. Implement a public education program, in partnership with the other poultry association, to inform those who keep their own birds: Encourage Poultry association to take the lead here 6. Invest in an emergency response program, in conjunction with other poultry boards, for non-licensed producers: · Provide media response for the unregulated (we have the rest of the emergency response program in place now) Establish a third party who can validate the actions we take · Have camera ready media support showing what goes on normally



SI #5 (cont.)

Taking
leadership
in setting
standards
and ensuring
compliance –
fundamental
to our social
license

Objective	s			Strategies & Actions
Objective 5.2 To have every Producer with over 99 hens fall under our system by Dec. 31, 2020)20	 Explore the potential to access census data to aid this process Work with PHA's, Provincial government, and Federal government on clear 	
50 Producers Today	2016 75	100	2018 125	 regulations: What is allowable in restaurants and in retail What is allowable re reusing of egg cartons 3. Work with industry associations to remind their members about the risks of nonlicensed eggs 4. Work with Public Health Authorities to ensure that any occurrences of Se are reported in a timely manner to BCEMB 5. We will revisit our current practices around small lot licenses and consider developing a more favourable membership fee structure to encourage enrolment

6. Lobby EFC to ensure that the small lot farmers don't interfere with our quota



SI#6

Underlying SWOT issues:

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O5 Growth in demand for eggs in further processing

to meet the needs of further Processors and their customers

Objectives	Strategies & Actions
Objective 6.1 To establish a framework that allows us to: a. meet the current commitment rate of 23,500 boxes per week by March 31, 2016 b. meet the demand of future growth	 We will establish a working committee to take the lead in finding solutions, examples: Pursue the idea of EFC paying the differential — they are now paying — to us, to aid our negotiation on pricing Put an RFP out to the industry inviting them into a joint venture partnership with the FP that will help fulfill the demand Establish a better process for information sharing amongst BC Egg, Graders, and Further Processors

SI #7

Sustaining and extending our successful pricing model

Underlying SWOT issues:



We have been able to establish a successful pricing regime, including a system that prices specialty eggs



We have not succeeded in convincing other Provincial Egg Boards to price specialty eggs

Objectives	Strategies & Actions
Objective 7.1 To have each provincial egg marketing board adopt BC's pricing strategy for specialty eggs, by June 30, 2016	 Capture the current methodology in BC Work with other marketing boards to bring them onboard with pricing specialty eggs



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