

May 27, 2019

Kirsten Pedersen
Executive Director
BC Farm Industry Review Board
780 Blanshard Street, 1st floor
Victoria BC V8W 2H1

Dear Kirsten,

Request for BCFIRB's approval on BCEMB's changes to its Consolidated Orders to operationally incorporate the BCFIRB directives from the Quota Assessment Tools Supervisory Review (QATR) Decision

On [February 2, 2018](#), BCFIRB provided its Quota Assessment Tools Supervisory Review (QATR) directive to the Supply Managed Commodities. This review afforded each supply managed commodity board with the authority to change their rules related to quota assessments, namely LIFO and 10/10/10, by replacing them with new assessment directives that are intended to improve quota liquidity.

In our [August 3](#) and [December 5](#), 2018 letters, BCEMB sought to expand the list of exempt persons from BCFIRB's 12 month moratorium directive for growth quota, specifically that s. 179(c)(i) be expanded to include the persons set out in Part V(3)(5)(a-g) of Consolidated Orders dated November 1, 2017.

Our Board would like to thank the BCFIRB for the thorough consideration and analysis of our previous letters and clarification requests. In its most recent letter to BCEMB on [February 26, 2019](#)¹ BCFIRB stated:

41. *BCFIRB wonders if sufficient advance notice of a rule change, along with appropriate application of 179(c)(i) of the Quota Review decision, would be a possible option to help mitigate the main sound marketing policy issues the Egg Board raises in relation to changing industry infrastructure and operating context. BCFIRB issued its Quota Review decision over a year ago.*
42. *Further, paragraph 179(c)(i) of the Quota Review decision states that quota transfers that do not result in an overall change in total quota holdings within a business unit will not trigger the 12 month moratorium on receiving growth. Commodity boards were left free to define "business unit" in a manner that is effective and strategic for their industries. It is unclear whether the Egg Board explored how this exception could be used to mitigate the issues it has identified.*

After consideration of the above and subsequent engagement with the BC Egg Industry Advisory Committee (EIAC), the BC Egg Marketing Board has decided that as of June 1, 2021 BCEMB will change its Consolidated Orders to incorporate the new quota management tools under the QATR. Effective June 1, 2021 the BC Egg Marketing Board Consolidated Orders will reflect the directives by:

1. Removal of Last in First Out (LIFO);

¹ BC Farm Industry Review Board, BC Egg Marketing Board Recommendation, [February 26, 2019](#)

2. Removal of the 10/10/10 declining assessment schedule;
3. Removal of the 5% assessment on quota issued by boards prior to 2005.
4. Adoption of a 10/10/0 declining assessment schedule applied to the first transfer of all growth quota issued to date and going forward;
5. Adoption of 12 month moratorium on all quota transfers detailed in paragraph 179(c) and 179(c)i. of the February 2, 2018 QATR decision;
6. Definitions of *Base Quota*, *Business Unit*, and *Growth Layer Quota*.

Details on the proposed amendments to the Consolidated Orders (items #1 – 6) and SAFETI analysis are presented in Section 1 on the following page.

A SAFETI analysis for the implementation date of June 1, 2021 is presented in Section 2. BCEMB considered multiple timeline options for implementation and it was agreed that for business continuity, fulsome producer training and producer choice to conduct their plans before or after the new rules are applied, a minimum of two years notice must be provided. This would allow producers to make informed decisions with full knowledge of the quota management tools framework.

The Amending Order to the Consolidated Orders is presented in Section 3.

Thank you for your consideration. We look forward to constructive dialogue with BCFIRB on the aforementioned changes.



Katie Lowe P.Ag.
Executive Director

SECTION 1 – Amendments to Consolidated Orders and SAFETI Analysis

BCFIRB directed the supply management boards to remove LIFO and the 5% assessment on quota issued by boards prior to 2005, and replace 10/10/10 with a declining assessment schedule of 10/10/0 on the first transfer of incentive quota, when the boards were ready to incorporate the new quota management tools into their Consolidated Orders. The following SAFETI analysis focuses on the amendments to Consolidated Orders that BCEMB proposes to implement, as per the intent of the QATR objectives.

(a) Removal of LIFO and 10/10/10 in favour of a 10/10/0 declining assessment schedule on transfer of any incentive quotas issued under the New Producer Program or Growth Layer Quota.

(b) Additional definitions:

“Base Quota” means Layer Quota that has been transferred at least once or growth quota that has been in production for 11 years or quota issued under Part IV 5 that has been in production for 11 years.

“Business Unit” means a Registered Producer and:

- (a) that Registered Producer’s spouse, sibling, parent, child, or child and the child’s spouse;
- (b) another Registered Producer that is a Related Corporate Producer in relation to that Registered Producer

“Growth Layer Quota” means new Layer Quota that is issued by the Board as a consequence of an increase to the Province’s allocation

Strategic- *Identifying key opportunities and systemic challenges, and plan for actions to effectively manage risks and take advantage of future opportunities.*

First, when considering the removal of Last in First Out (LIFO) our board has decided to not add First in First Out (FIFO) or any other rule which dictates which quota must be transferred first. This will allow producers to consider their assessment schedule (ie. how long each quota unit they received has been held) and choose to transfer whichever quota they want.

Second, throughout our review, consultations and deliberations, it became clear that definitions were needed to clarify the quota under discussion since the status of the quota on transfer determines what, if any, assessments are required. With our proposed changes, any quota that has been held for 11 or more years or transferred once will become Base Quota. The simple definitions put forward will provide clarity on Growth Layer Quota and Base Quota that are needed by producers to assess their business operations.

Further, it was also clear that New Producer Program members should not indefinitely be referred to as “New Producer Program winners”. An added benefit of the definition for Base Quota is that after 11 years in production, New Producer Program winners will be considered in the same category as our other established producers. This approach reflects fair and equitable treatment and acknowledges producer commitment to the industry.

Regarding our addition and definition of “Business Unit”, in its [February 26, 2019](#)² letter BCFIRB stated:

41. Further, paragraph 179(c)(i) of the Quota Review decision states that quota transfers that do not result in an overall change in total quota holdings within a business unit will not trigger the 12 month moratorium on receiving growth. Commodity boards were left free to define “business unit” in a manner that is effective and strategic for their industries. It is unclear whether the Egg Board explored how this exception could be used to mitigate the issues it has identified.

Encouraging producers to continue to responsibly plan for the future of their families’ farms as well as providing allowances for business restructuring is strategic. Our board maintains that gradual succession is strategic and allows for the successor to learn the industry and innovate by trying new production types as the family business expands. Many succession and expansion plans include the construction of multiple operations, under different business names.

BCEMB’s “Business unit” definition will strategically and effectively provide continuity in the flow of quota amongst related registered producers and related corporate producers moving forward. This strategic succession and expansion planning ensures more stable business units and therefore a more stable industry overall that is better able to meet market demand.

The BCFIRB letter on [February 2, 2018](#)³ states:

117. Making substantive changes to fundamental quota management directions based on circumstances as they exist at a certain point may not result in sound marketing policy. On the other hand, it is not sound marketing policy for quota management policies and rules to generate undue issues when markets are in different states. From a principles-based regulatory and sound marketing policy basis, quota management policies and rules should endeavor to be effective, strategic and accountable under all market conditions (barring exceptional circumstances).

Allowing producers to effectively plan for succession, manage business risks and expansion to meet market needs is sound marketing policy and in the public interest. In each of these situations, the following objectives as stated in the BCFIRB letter on [February 2, 2018](#) are being met without the need for penalties:

129. a) Quota holders do not receive direct immediate financial benefit by transferring quota received from the board, rather than producing it in the first instance; and,

129. b) Quota issued by the board goes to producers in the first instance who are able and willing to produce it (quota holders have the option of accepting or refusing growth quota).

BCFIRB raised concerns that a quota holder may transfer quota for financial gain, rather than producing it. Although the risk is real when considering third party transfers, BCEMB’s proposed definition for business unit is strategic in reducing this risk. It is necessary for producers to be able to expand their operations and bring family members (child and spouse) into the industry without punitive action. These transfers are not done for financial benefit derived from the sale of quota.

² BC Farm Industry Review Board, BC Egg Marketing Board Recommendation, [February 26, 2019](#)

³ BC Farm Industry Review Board, Quota Assessment Tools Supervisory Review, [February 2, 2018](#)

The business unit definition continues to allow for succession planning and farm expansion without disincentives, and supports sound marketing policy.

Accountable - *Accountability is about maintaining legitimacy and integrity through understanding and discharging responsibilities.*

BCEMB's business unit definition recognizes the different challenges faced by our producers and provides them with the ability to move forward with their succession and expansion plans without requiring them to form large corporate structures. It maintains accountability to the family farms within BC while discouraging transfers for the purpose of financial gain.

Fair - *Ensuring procedural fairness in processes and decision making.*

BCFIRB has continually allowed for the exemption of family transfers and corporate transfers, provided the relative quota holdings of each shareholder within the corporation remains consistent. With the new business unit definition, BCEMB will ensure fairness for all producers by ensuring business and succession planning can continue with only minor improvements.

Effective - *Ensuring clearly defined outcomes with appropriate processes and measures.*

With the changes we have proposed, producers will continue to be free to structure their business(es) in a manner that works best for them without implementing unnecessarily restrictive rules for corporate structures, leading to a successful and vibrant industry.

A sustainable provincial industry should allow for succession planning to occur in a strategic manner where business ownership, transfers, and skills are built for the next generation while still having the ability to rely on parents for direction. In many situations, once learning the business, the children would like their independence. In this situation, the parents may provide some quota to their child to set up their own farm, while still intending to be fully active in egg production.

BCEMB remains committed to ensure that quota is produced and BCEMB endeavours to ensure that the changes we propose will not compromise and/or weaken our quota management practices. While we do not anticipate any negative consequences with our proposed changes, BCEMB and its Board of Directors will be carefully monitoring quota transfers to ensure that there are no unforeseen consequences. Any and all quota transfers are subject to approval by the BC Egg Board of Directors; this means that the BC Egg directors will be directly involved in the review and approval of all quota transfers, therefore, any unforeseen or emerging trends/issues will be immediately addressed by the Board.

Transparent - *Ensuring that processes, practices, procedures, and reporting on how the mandate is exercised are open, accessible and fully informed.*

The BCEMB ensured that industry stakeholders were informed of each step of the Quota Assessment Tools Review process. Stakeholder input, obtained through consultations, meetings and verbal conversations have been taken into account throughout the process. Consultation information and the formal submission were posted on the [BCEMB website](#) and producers have been made aware of new developments in the process through BCEMB newsletters – the Scrambler and the FastFry.

Once approved by BCFIRB, the Amending Order will be sent to all producers and they will be informed of the implementation timeline. In addition, the BCEMB will conduct training sessions to ensure that all producers understand the rules and how they will be implemented.

All transfers must be approved by the BCEMB Board of Directors, ensuring that assessments are applied in a consistent manner, according to the Consolidated Orders. All quota transfers and assessments are included in the annual PARP reports posted to the BCEMB website, as required by BCFIRB, providing additional transparency.

Inclusive - *Ensuring that appropriate interests, including the public interest, are considered.*

Whether it is a large corporate family farm, a corporation of producers that are not related by family, or many individual smaller farms, BCEMB does not seek to hinder or discourage business and/or succession planning by dictating or providing disincentives which provide favorable administrative treatment for one business structure over another.

The BCFIRB Quota Assessment Tools Supervisory Review on [February 2, 2018](#)⁴ states:

182. Mechanisms should be applied in such a manner that they do not unduly advantage or disadvantage a particular producer or specific group of producers.

Any businesses related by family or similar shareholders have the opportunity to transfer quota amongst their business units free from the possibility of forfeiting future growth, provided the transfer does not trigger assessments.

With the updated orders, all producers have the same opportunity to incorporate new shareholders to their business through the transfer of base quota without fear of assessments or the possibility of forfeiting future growth. There may be a slight advantage to those transfers which are exempt from assessment in this situation as an exempt transfer will not trigger an assessment and therefore more than just base quota can be transferred within the business unit. This is due to the existing quota transfer assessment exemption rules which have been in effect since 2004 and remained unchanged throughout this process.

Through enhanced liquidity in quota, our board is confident that the changes outlined in the amendments to our Consolidated Orders will improve accessibility of quota for all stakeholders.

Our board is supportive of BCFIRB's directive, introduced in 2004, which provided exemptions for family transfers, which continued to receive BCFIRB's support through its February 2, 2018 QATR review. Our board recognizes that industry entry will always be easiest for those with direct family members who are already in the industry; BCEMB supports this directive as the family farm is a core value of supply management. From an administrative perspective, the proposed Business Unit definition will subject Related Corporate Producers to similar rules and structures creating parity amongst all quota holders.

As previously communicated in our QATR submission in [June 2017](#), consistent growth coupled with the LIFO and 10/10/10 directives were resulting in sizeable assessments, which strongly discouraged quota sales. Further, our egg industry is in a period of transition to meet the density and housing commitments made through the updated 2017 Code of Practice. We believe that the removal of the 5%

⁴ BC Farm Industry Review Board, Quota Assessment Tools Supervisory Review, [February 2, 2018](#)

transfer assessment coupled with the removal of the LIFO directive, will benefit outside stakeholders who wish to enter the industry as existing producers who wish to downsize will now have a mechanism to do so without losing a substantial portion of their quota.

Once implemented, we expect enhanced quota liquidity will lower the barriers to entry for those who wish to purchase quota on the exchange. Our board believes that the administered price on our quota exchange will likely remain status quo or increase with the changes to assessments as more quota is available. The Consolidated Orders contain controls that will continue to let the market dictate the price of quota in future exchanges.

SECTION 2 - SAFETI Analysis for 24 month timeline – Implementation date of June 1, 2021 for revised Consolidated Orders

BCEMB has decided on a 24 month timeline before the new quota management directives are in effect. The rationale for this decision is presented in the SAFETI analysis below:

Strategic- *Identifying key opportunities and systemic challenges, and plan for actions to effectively manage risks and take advantage of future opportunities.*

In BCFIRB's [August 27, 2018](#)⁵ letter to BCEMB, it states:

The Egg Board is correct in interpreting the intent of paragraph 172 as commodity boards and commissions having the discretion as to when to adopt and apply the Quota Review directions as part of their Consolidated Orders. The Egg Board is free to adopt the Quota Review directions on October 1, 2018 or on any other date it considers effective and strategic. It does not require BCFIRB approval to do so. BCFIRB expects that the Egg Board would give producers appropriate notice of Quota Review related changes to the Consolidated Orders so producers can make any necessary business decisions.

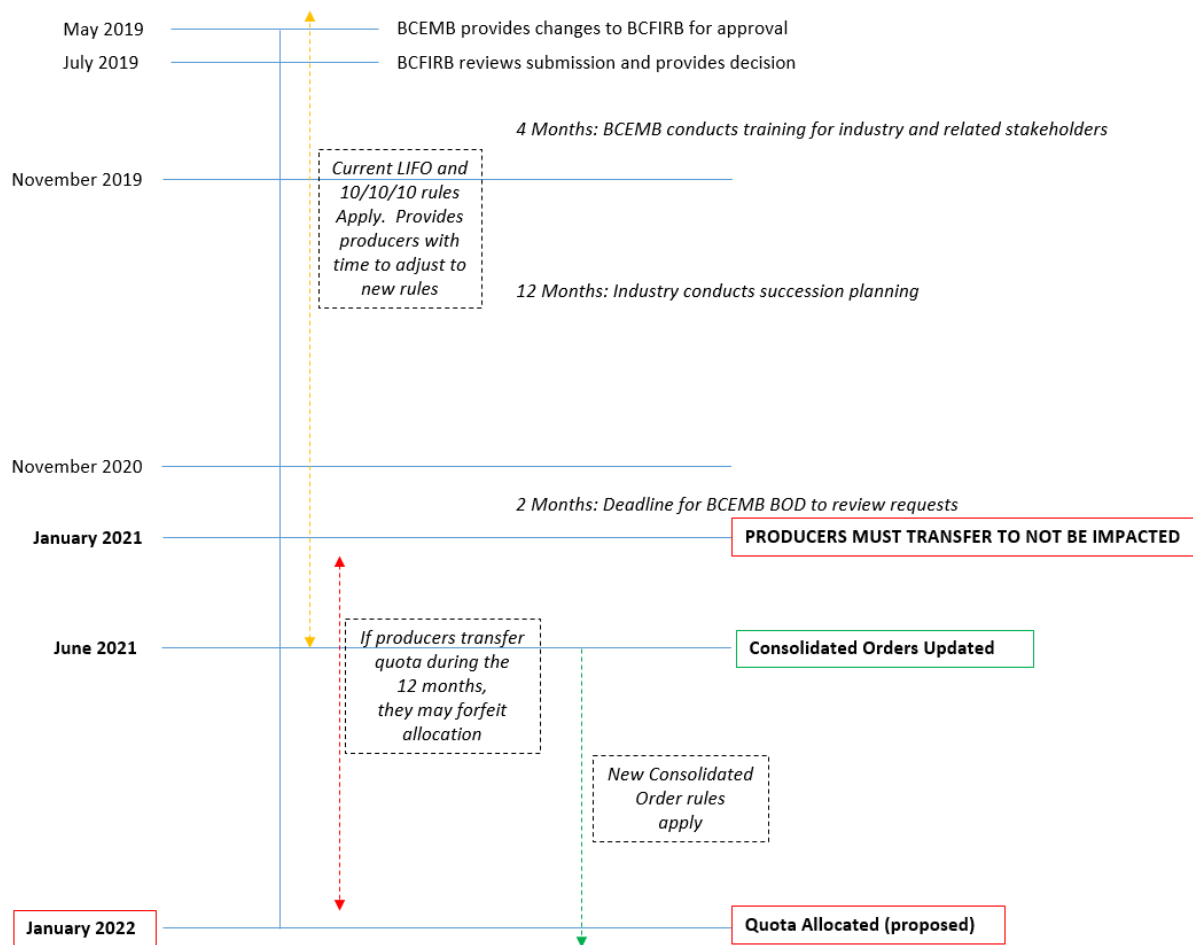
Extensive training will need to be conducted to ensure the industry is aware of the new rules and how they will impact their succession planning. Once BCFIRB has approved the changes, BCEMB will begin training producers, lawyers, accountants, and other industry stakeholders that support producers in their decisions. Due to the complexity of the changes, we feel that written notifications via email alone would be an ineffective training plan for our stakeholders. Instead, multiple face-to-face training sessions will be required throughout BC to ensure that all producers have an equal opportunity to review the information and ask specific questions. BCEMB believes compliance with BCFIRB's direction to provide producers appropriate notice, includes conducting extensive training prior to the orders going in to effect.

Business/succession planning takes time. Feedback received from the Egg Industry Advisory Committee suggested a 24-month timeline for the industry implementation. This measured timeline for implementation would allow BCEMB producers to make informed strategic business decisions with full understanding of the quota management tools framework. A 24 month timeline provides sufficient time for:

1. The BCEMB to prepare producer training materials
2. The BCEMB to train its producers and stakeholders
3. Registered producers and stakeholders to understand the changes, discuss them with family, accountants, and/or legal counsel, and make an informed business decision with full knowledge of the quota management tools framework
4. The BCEMB Board of Directors to adjudicate producer quota transfer applications

The BCEMB Board of Directors and EIAC expect that the above list will take 18 months to complete. A detailed depiction of our expected timeline is presented in the diagram below:

⁵ BC Farm Industry Review Board, Quota Assessment Tools Evaluation, [August 27, 2018](#)



Other timelines for QATR adoption considered:

1. Immediate adoption
2. 12 month period before adoption
3. 18 month period before adoption
4. Immediate adoption after the next allocation; delay next allocation until after all producers are no longer impacted by the 12 month moratorium

Other implementation timelines #1 through #3 were considered by BCEMB and the EIAC, however it was deemed that any timeline shorter than 24 months would be insufficient time for our existing producers. Option #4 would not be inline with BCFIRB’s directive regarding appropriate producer notice. Once BCFIRB has confirmed the Consolidated Order changes BCEMB will begin training its producers and stakeholders so that informed business decisions can be made with respect to the future of their farm operations.

A key reason for the 24 timeline is that on [May 15, 2018](#) BCFIRB provided clarification that the 12 month moratorium was retrospective once a commodity board chooses to change its Consolidated Orders and therefore, any registered producer who had transferred out quota would be ineligible for growth once LIFO and 10/10/10 was replaced with the new changes. With the impending allocation and uncertainty

with respect to how and when BCEMB will change its Consolidated Orders, producers have ceased all quota transfers as they did not want to inadvertently forfeit the next quota allocation. The last intentional quota transfer (exempt or non-exempt) from a BCEMB registered producer who did not leave the industry occurred in April 2018.

The absence of quota transfer requests does not lead us to believe that business planning has ceased; instead, we believe that producers are merely waiting to understand the quota framework so they can make informed decisions to best position their operations moving forward. The 24 month timeline will provide adequate time so that registered producers will be able to choose if they want to complete any transfers under current LIFO and 10/10/10 implications or under the new quota management rules.

Option #4 is only included in this letter because an outside stakeholder may view it as the obvious strategic implementation plan. Our Board's objective for quota management aligns with BCFIRB's - that quota is intended to be produced. One comment we would add is that BCEMB wants quota to be produced as soon as possible. BC is considered a "have not" province, meaning that even at 100% utilization of our federally allotted quota, BC will still need imports from neighbouring provinces. We want BC consumers to have access to BC eggs; any unnecessary delays on allocations is a non-starter to our Board as it would be unfavorable to BC producers, and by extension BC consumers.

Accountable - *Accountability is about maintaining legitimacy and integrity through understanding and discharging responsibilities.*

There is currently a great amount of confusion within the industry regarding the proposed new rules. To be accountable to the industry, training must be conducted to ensure that producers understand the new rules. BCEMB must be accountable to the industry by balancing the needs of producers who are buying, selling, or succession planning, and the needs of other industry stakeholders. By selecting 24-months, BCEMB believes it is being accountable to all parties by providing all groups with enough time to strategically plan their businesses, while being accountable to BCFIRB by implementing the changes as quickly as possible.

Fair - *Ensuring procedural fairness in processes and decision making.*

As with any changes to policy, the BCEMB is required to ensure that the interests of all potentially affected parties are considered and all parties have the knowledge to make sound business decisions that will strengthen the industry. The goal is to ensure no producer group is unfairly disadvantaged or advantaged by making the timeline too long or short.

Effective - *Ensuring clearly defined outcomes with appropriate processes and measures.*

The BCFIRB letter on [February 26, 2019](#)⁶ states:

4. BCFIRB also stated in the Quota Review decision, that commodity boards could continue to operate under BCFIRB's 2005 Specialty Review quota management directions until such time boards decide it is strategic and effective to adopt the Quota Review directions which replace some of the 2005 directions.

⁶ BC Farm Industry Review Board, BC Egg Marketing Board Recommendation, [February 26, 2019](#)

Until the changes are made, LIFO and 10/10/10 will remain in effect. This directive along with others in our Consolidated Orders have been effective to ensure that quota issued by BCEMB to its registered producers is being produced by the producer it was issued to.

The current BCEMB Regulations which ensure active engagement that have been effective to date, will remain unchanged. We feel that our proposed changes will be positive for industry through improved quota liquidity which will make quota more accessible for interested stakeholders.

While we are expecting a positive impact for industry from these proposed changes, we will be closely monitoring the outcome and will continue to report annually to BCFIRB and public stakeholders through the PARP.

As this is a fundamental change to management of quota, our Board feels it would be prudent for BCEMB to complete a review three years after the change occurs in our Consolidated Orders (est. June 2024). If a review is required sooner for any reason, BCEMB will conduct a principled, evidenced-based consultation, and submit our recommendations for BCFIRB's consideration.

Transparent - *Ensuring that processes, practices, procedures, and reporting on how the mandate is exercised are open, accessible and fully informed.*

BCEMB's public distribution of the revised Consolidated Orders, timeline for implementation, and training plan ensures that the principles of transparency are adhered to as producers will be able to continue succession planning and strategic farm expansions with full understanding of the implications of quota transfers on future quota allocations.

Further, monitoring of the landscape and management of quota will continue to be reported by BCEMB annually with our PARP submission to BCFIRB. This information will also be accessible on our public website for industry and the public.

Inclusive - *Ensuring that appropriate interests, including the public interest, are considered.*

The BCFIRB Quota Assessment Tools Supervisory Review on [February 2, 2018](#)⁷ states:

182. Mechanisms should be applied in such a manner that they do not unduly advantage or disadvantage a particular producer or specific group of producers.

BCEMB's 24 month timeline will ensure that all producers (family farms of varying situation, sizes, and corporate structures) will be treated equally and fairly by not providing any one individual group with an operational advantage over the others. Our training will be offered throughout BC so that every stakeholder segment will receive equal opportunities for engagement and training.

⁷ BC Farm Industry Review Board, Quota Assessment Tools Supervisory Review, [February 2, 2018](#)

Section 3 – Proposed Amendments to Consolidated Order

**AMENDING ORDER #007
TO THE
CONSOLIDATED ORDER OF NOVEMBER 1, 2017**

**MADE BY
THE BRITISH COLUMBIA EGG MARKETING BOARD
ON May 31, 2019**

The British Columbia Egg Marketing Board orders as follows:

1. Section 2 of Part 1 of the Consolidated Order of November 1, 2017 is amended by adding the following definitions to the list alphabetically:

“**Base Quota**” means Layer Quota that has been transferred at least once or growth quota that has been in production for 11 years or quota issued under Part IV 5 that has been in production for 11 years.

“**Business Unit**” means a Registered Producer and:

- (c) that Registered Producer’s spouse, sibling, parent, child, or child and the child’s spouse;
- (d) another Registered Producer that is a Related Corporate Producer in relation to that Registered Producer

“**Growth Layer Quota**” means new Layer Quota that is issued by the Board as a consequence of an increase to the Province’s allocation.

2. Subsection 2(3) of Part III of the Consolidated Order of November 1, 2017 is amended by adding the following paragraphs immediately following paragraph (k):

- (l) The Board will not issue quota to a producer while that Producer is leasing quota to another producer under Part VII 1. (2).
- (m) to any Person who has transferred any quota within the last 12 months, including exempt and non-exempt transfers, with one exception as follows:
 - (i) If a quota transfer does not result in an overall change in total quota holdings within a business unit, quota holders within that business unit remain eligible to receive growth.

3. Subsection 2(4) of Part III of the Consolidated Order of November 1, 2017 is amended by updating the following paragraph:

- (4) Where a Person is ineligible to receive an issuance of Layer Quota by reason of paragraph (3)(i), (j), or (k) or (l), the Layer Quota that cannot be so accommodated:

4. Subsection 2(5) of Part III of the Consolidated Order of November 1, 2017 is amended by removing the following paragraph:

(5) The Board will not issue quota to a producer while that Producer is leasing quota to another producer under Part VII 1. (2).

5. Subsection 4(1) of Part V of the Consolidated Order of November 1, 2017 is amended by updating the following paragraphs and removing paragraph (a) and (b):

(1) Subject to subsection (3), where Layer Quota is Transferred, on the first transfer of any growth quota issued, or incentive quota issued under Part IV, the Transferor shall surrender to the Board an amount of Layer Quota calculated 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	0% reverts to the Board

6. Subsection 4(2) of Part V of the Consolidated Order of November 1, 2017 is amended by removing the following paragraph and renumbering the subsequent subsections:

(2) For the purposes of subsection (1), the Layer Quota being Transferred is deemed to be the Layer Quota most recently allotted to the Transferor.

7. Subsection 4(4) of Part V of the Consolidated Order of November 1, 2017 is amended by updating the following paragraphs:

(4) A surrender of Layer Quota pursuant to paragraph 34(1)13(1)(a) and 13(1)(b) is not required where:

8. This Order comes into effect June 1, 2021.

DATED at Abbotsford, British Columbia, on June 24, 2019

BRITISH COLUMBIA EGG MARKETING BOARD

Gunta Vitins, Chair