

**Administrative Monetary Penalties – Second Survey Results**

Based on the results of January 10, 2022 survey and the additional EPA feedback, the BCEMB determined that implementing an AMP Program at this time was not required. Due to the change in direction, a second round of consultation was conducted.

On May 2, 2022, a second consultation package and on-line survey were sent to the 381 industry stakeholders<sup>1</sup> asking if they support the BCEMB position that an AMP Program is not required for the BC egg industry at this time. The survey closed on May 16, 2022. Sixty-four respondents completed the on-line survey, representing a total survey response rate of 17%. However, 52 respondents were registered producers and thus represented a survey response rate of 35% for all 149 registered producers. Analysis of the responses from the 64 survey respondents indicate that an overwhelming 93.8% of respondents (60 industry stakeholders), agreed that an AMP Program is not required at this time.

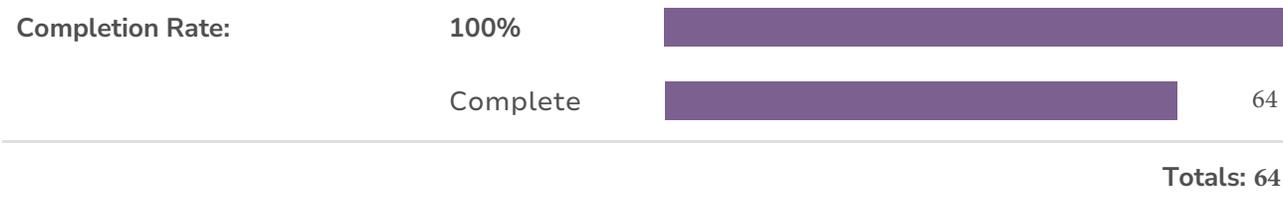
Attached are the full survey results.

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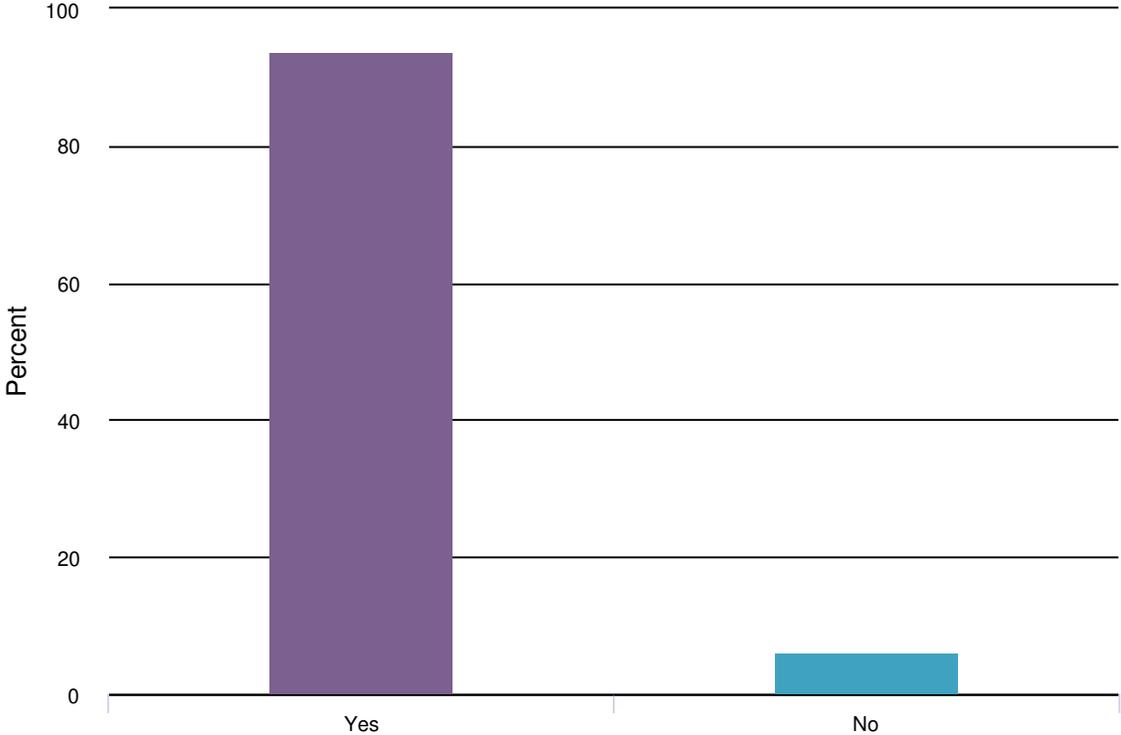
<sup>1</sup> The on-line survey was distributed to 381 industry stakeholders including BC's 149 registered producers, allied trades, graders and small lot permit holders. Many businesses/farms had more than one email recipient for the on-line survey (e.g. owners, managers, etc)

# Report for AMP May Consultation

## Response Counts



1. Do you support the BCEMB position that AMPs are not required for the BC Egg industry at this time?



Value	Percent	Responses
Yes	93.8%	60
No	6.3%	4

## 2. Please provide any additional comments.

ResponseID	Response
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1	I agree
2	Test
4	Correct, we do not need/want AMPs.
13	The BCEMB has done a great job with their comprehensive review of the current enforcement mechanisms. I agree that this mechanisms are more than adequate and have proved to be very effective.
17	Correct, they are not needed/wanted.
19	It seems that the problems come from unregistered producer. I don't think BCEMB should be the police in this case.
20	We have enough mechanisms in place for penalizing producers if needed. Backyard flocks should not be the jurisdiction of BC Egg
22	Agree that bcegg has enough tools in the box to deal with non compliance.
29	All producers should be held to account and charged a penalty if not following the consolidated orders b
35	The Administrative Monetary penalty system is a terrible system which erodes trust in government and/or the regulators that use it. Described as being draconian by Canada's Supreme Court Judges, the system deems a regulated party guilty until you prove yourself innocent. This is wrong. The appeal process is blatantly unfair and biased heavily against the impacted party.
56	No fines needed
67	I initially thought that a monetary penalty would be an effective tool in deterring producers who are letting standards slip, but upon further review I fully agree with the board's recommendation to not proceed with AMPs at this time as sufficient Protocols are already in place.