



BC Chicken Growers'
ASSOCIATION

March 30, 2021

BY EMAIL

Wendy Holm, BC Farm Industry Review Board Liaison

RE: SENSITIVE AND CONFIDENTIAL INFORMATION

Dear Wendy,

As you know, the BC Chicken Growers' Association (BCCGA) has, throughout this process, expressed concerns about its ability to disseminate materials freely to its experts and consultants. This concern has arisen primarily with respect to the restrictions on dissemination of certain material sought by the Processors.

The Long-Term Chicken Sector Pricing – Review Process - July 13, 2020 noted that sensitive and confidential Information identified by the parties as confidential or sensitive would be managed under BCFIRB's "Supervisory Rule on Protection of Privacy and Confidentiality in BCFIRB Supervisory Processes and Reviews" (the "Rule"). Under that Rule, the Review's Project Leader is to work with the boards, the parties and BCFIRB as necessary, to ensure that while sensitive information is protected, essential and appropriate information, critical to moving issues forward, is shared with parties.

Candidly, the BCCGA is unclear what process is currently being used by you with respect to the designation of material as confidential and subjected to restricted disclosure. Specifically, what criteria is being adopted for designating something as confidential and subject to restricted or limited disclosure? It appears that the only process is an adaption by you, at face value, arising from a party requesting that a specific document be designated as confidential and/or subject to restricted disclosure.

Again, these concerns flow from our ability to make a meaningful consideration and response of the Processors' materials. The Processors are abusing this lack of process; as but one example: requesting that their comments on BCCGA submitted documents be restricted from our consultants – the very persons who assisted with the creation of the BCCGA documents.

The BCCGA again requests that the process and basis for designating documents as confidential and or/restricted from disclosure be expressly stated and that a review process be outlined to address material which has been designated as confidential and/or subject to restricted disclosure, should a party wish to challenge that designation.

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In the interim, the BCCGA's position is that if the Processors intend to hold back documents (such as the high-level questions asked by the BC Chicken Marketing Board, or otherwise), then the BCCGA will hold back similar documents as well.

Accordingly, our position on the classes of documents identified by you is as follows:

1. To share the following without caveat and may be also posted to the website with all documents/presentations at the same time:
 - February 2, 2021 Return on investment (from Serecon)
 - Mar 12, 2021 follow up letter re costs and returns + ALL BUT TWO of the appendices.
2. To share the following on a RESTRICTED, CONFIDENTIAL BASIS IF PPPABC does the same with all their documents. AND IF all RESTRICTED, CONFIDENTIAL documents are released at the same time:
 - Comparative Costs and Returns in Chicken Processing: British Columbia versus Competing Regions in Canada – June 2017
 - Comparative Costs and Returns in Hatcheries: British Columbia versus Competing Regions in Canada – July 2019
 - February 1, 2021 High Level Questions Regarding Processor Submissions
 - March 9, 2021 BCCGA Responses to Question by the BC Chicken Marketing Board
 - Mar 12, 2021 Follow up letter re Friesen and appendix

Sincerely,



Dale Krahn
President
BC Chicken Growers' Association

Cc: Harvey Sasaki, Chair - BC Chicken Marketing Board
Jim Collins, Chair - BC Broiler Hatching Egg Commission
Bill Vanderspek, BCCMB Executive Director - BC Chicken Marketing Board

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