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The Honourable Lana Popham
Minister of Agriculture and Food
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Dear Minister Popham:

RE: RECOMMENDATION FROM BCFIRB THAT THE MINISTRY OF AGRICULTURE AND FOOD REVIEW THE 2004 REGULATED MARKETING ECONOMIC POLICY

As you know, the 2004 [Regulated Marketing Economic Policy](#) (2004 Policy), developed by the Ministry of Agriculture and Food¹ (Ministry), is a broad statement of provincial interests regarding BC's regulated marketing sector². Now, more than 20 years later, new environmental, economic, and social realities are reshaping the priorities of this important sector.

In light of these shifts, the BC Farm Industry Review Board (BCFIRB) recommends that the Ministry undertake a review and renewal of the 2004 Policy to confirm provincial intent and identify updated priorities for the regulated marketing sector.

The regulated marketing sector as a whole accounts for close to 50% of total farmgate sales in BC, demonstrating the sector's significant contribution to the province's economy and food supply security, and highlighting the importance of ensuring Ministry policies reflect the progress and challenges facing the sector.

Progress in Regulated Marketing Since the 2004 Policy

The 2004 Policy provided guidance to the regulated marketing sector and contributed to significant progress on many of the themes in the 2004 Policy. As the provincial supervisor of BC's regulated marketing boards and commissions (commodity boards),

¹ "Ministry of Agriculture, Food and Fisheries" at the time.

² In British Columbia, broiler hatching eggs, chicken, table eggs, cow milk, and turkey are federally supply managed commodities; hogs, cranberries and vegetables are provincially regulated but non-supply managed commodities.

BCFIRB has a unique vantage point to understand the positive developments across this sector over time as well as recognize the new challenges confronting it.

BCFIRB has reviewed and directed numerous policy and program initiatives for BC's commodity boards over the years that have increased industry responsiveness, accountability, and resilience. For example, BC's commodity boards have introduced the following programs and policies:

- ***Food Safety, Biosecurity and Animal Welfare Programs:*** Commodity boards have implemented mandatory compliance to rigorous production standards for all producers within their sectors, verified through program audits. These programs differentiate and create high value for BC products in the Canadian and global marketplace.

In 2024, BCFIRB directed supply managed commodity boards to implement [administrative monetary penalties \(AMPs\)](#) or to “meet or beat” BCFIRB's expectations for compliance and enforcement processes to ensure the effectiveness of their mandatory biosecurity programs (including food safety, disease control, animal welfare, etc.). BCFIRB's direction to the commodity boards also serves to protect and promote a safe and consistent supply of BC products and ensure transparency for consumers through the commodity boards' reports on program compliance and enforcement to BCFIRB's [Public Accountability and Reporting Program \(PARP\)](#).

- ***Specialty Products:*** Commodity boards have adopted policies that ensure the production of specialty products within the supply managed sector that meet consumer needs and ensure that producers are paid fairly for their additional production costs (a key initiative of the 2004 Policy).

BCFIRB's [2005 Specialty Review](#) was undertaken directly in response to the 2004 Policy and resulted in direction to supply managed commodity boards to support and promote specialty production and new entrant opportunities.

BCFIRB's [2016 Quota Assessment Tools Evaluation Project \(QATE\)](#) evaluated the success of current programs on reducing quota-related barriers to entry. BCFIRB mandated acceptance of new producers through new entrant programs (NEPs), and the regular updating of these programs to support regional and specialty market development opportunities.

- ***New Entrant Programs and Support:*** In response to the 2004 Policy and BCFIRB direction, commodity boards have implemented policies and programs that reduce barriers to entry for young and new farmers. The commodity boards regularly review these programs to meet the changing strategic priorities and needs of the sectors and enhance food security in the province.

In addition to BCFIRB's directions related to NEPs issued in 2005 and 2016 noted above, BCFIRB directed commodity boards in 2023 to [report data and](#)

[performance metrics for their NEPs through PARP](#). This reporting is intended to validate the effectiveness of existing commodity board policies related to NEPs, encourage strategic and measurable outcomes, and demonstrate public accountability.

These advances reflect the focused work and commitment of the commodity boards to high production standards, sector renewal, innovation, and adaptability, all of which are key principles articulated in the 2004 Policy.

Strategic Importance of Reviewing the 2004 Policy

Given the scale of change over the past two decades and the new issues and challenges that significantly impact the regulated marketing sector, BCFIRB believes now is the right time for the Ministry to revisit and modernize the 2004 Policy, in collaboration with the sector, to ensure it remains relevant and effective.

In January 2024, BCFIRB released its [Strategic Plan \(2024 to 2027\)](#). The Plan identifies some of the key challenges and opportunities confronting the regulated marketing sector and BCFIRB's strategic priorities and actions to address them. Priority #2, '*Help to future proof the agriculture sector*' includes the review of the 2004 Policy as a strategic action:

Recommend the BC Ministry of Agriculture and Food review the 2004 Regulated Marketing Economic Policy to consider new factors and challenges such as disease and biosecurity, climate change and disaster events, food security, Indigenous reconciliation, and BC's agricultural land reserve.

Before making this recommendation, BCFIRB conducted a cross-jurisdictional scan and took steps to understand commodity board perspectives on the current relevance of the 2004 Policy and the potential value of a revised Policy.

What We Heard from BC's Regulated Marketing Boards and Commissions

Over the past year, BCFIRB consulted the commodity boards on the value of the 2004 Policy to their current mandates and day-to-day operations (see Appendix 1: *BCFIRB What We Heard Report*). Their feedback underscores both the overall importance and enduring nature of the 2004 Policy to their mandates under the *Natural Products Marketing (BC) Act* (NMPA), but highlights the need for renewal. Commodity boards expressed a desire for clearer provincial recognition of their efforts and a more accurate reflection of the realities and priorities shaping their current work.

BCFIRB identified key themes from this engagement that support the case for reviewing the 2004 Policy.

Theme 1: Reinforcing Government Awareness, Commitment and Support for the Regulated Marketing Sector

Commodity boards emphasized the importance of a renewed Policy that affirms the provincial government's commitment to regulated marketing and acknowledges the critical role the sector plays in BC's food system. A strong message from the commodity boards was the need for government recognition of the significant progress the sector has made since the 2004 Policy was introduced. Since then, commodity boards have advanced food safety and quality assurance programs, introduced specialty production initiatives within supply management, and implemented policies to support new producer entry and sector resilience, all while improving governance practices and accountability measures across supply chains and with the public. These sector-led efforts have directly contributed to the growth of consumer trust and public confidence in BC agricultural products both here and abroad.

Commodity boards noted that the 2004 Policy's reference to the 'public interest' does not fully capture the scope or impact of sector achievements. They recommend revisiting 2004 Policy themes such as *Food Safety and Quality*, and *Recognition of Standards*, to better reflect the role of on-farm assurance programs in maintaining high production standards and reinforcing public trust in BC producers and products. These programs - which focus on biosecurity, animal welfare, and food safety - are now foundational to the public's understanding of food quality and the reliability of BC's food system. Commodity boards expressed strong desire for government recognition of these programs and initiatives as key mechanisms for maintaining public trust in BC's food system.

In addition to recognizing sector progress, commodity boards highlighted growing pressures threatening long-term resilience that the Policy could address. Priority concerns include:

- **Significant recurring biosecurity threats**, such as highly pathogenic avian influenza
- **Increasingly frequent and devastating climate-related emergencies**, including floods, droughts, and wildfires
- **Infrastructure and supply chain vulnerabilities**, such as water access, supply chain infrastructure, and land-use limitations within the Agricultural Land Reserve

These challenges and future unknown events cannot effectively be addressed by any one commodity board nor by the regulated marketing sector on its own but through a renewed Policy that reflects a shared commitment between government and the sector. Tangible policy support and related measures would assist commodity boards operationally as well as create long-term sustainability in regulated marketing and resilience in the BC food system.

BCFIRB notes that provincial recognition and support through a renewed Policy would reinforce partnerships between government and the regulated marketing sector, and lead to effective, targeted support for sustainable BC food production and profitable agriculture and food businesses. Renewed commitment from government could specifically target infrastructure investments to address critical pressures and needs as the regulated marketing sector continues to lead BC's food system in consumer confidence, domestic food production and consumption, and agriculture industry growth.

Theme 2: Aligning Provincial Policy and Sector Priorities and Needs

Commodity boards noted the 2004 Policy does not fully reflect their evolving mandates and strategic direction, nor the current realities of BC's agricultural landscape. The 2004 Policy sections on *Value Chain*, *Regional Industries*, and *Entry of New Producers* addressed priorities at that time, but given the progress that has been made and in consideration of today's pressures, these sections require updating and new themes to better align with the challenges and opportunities facing the sector.

The commodity boards see a clear opportunity to modernize the 2004 Policy and to particularly focus on economic sustainability across the regulated marketing sector. The sector comprises both supply managed and non-supply managed commodities with different strategic objectives and needs. Despite their differences, all commodities face significant economic challenges arising from high production and land costs unique to BC's geographic location, and all are focused on continued supply chain readiness as well as the viability and long-term sustainability of farm businesses. They need improved access to infrastructure, land, and labour, as well as strengthened supply chain resilience, both regionally and province-wide. These elements are essential to maintaining a robust and secure BC regulated marketing sector today and into the future.

A System-Wide Approach

BCFIRB notes other challenges to the regulated marketing sector that could be included and potentially addressed through Policy renewal. While commodity boards regulate aspects of production, including pricing, they also establish requirements and measures for other supply chain stakeholders not directly involved in production. Issues such as increased costs for these stakeholders and increased competition within the Canadian marketplace have led to increased litigation. A Policy review and renewal process that includes the regulators (commodity boards) as well as other key stakeholders across the regulated marketing system (e.g., processors) could strengthen the value of the Policy. The Policy could support a broader framework for collaboration on priorities, risks, opportunities, and action, including through improved provincial policies, regulated marketing sector and system innovation, and targeted investment.

Cross Jurisdictional Scan

BCFIRB reviewed provincial policies across Canada to understand how other provinces guide and support their regulated marketing sectors beyond their legislative frameworks.

Many provinces do not have specific provincial policies for their regulated marketing sectors. Quebec is unique in its broad agrifood policy that includes many of the key themes found in BC's 2004 Policy, but its policy encompasses agrifood sectors beyond the regulated sectors. Notably, Quebec takes a system-wide approach to stakeholder involvement and input on both the challenges and progress of its agrifood industry. Further, their process involves an annual review cycle, gathering input across supply chains, government, and academia on the progress achieved each year, and includes concrete plans for each stakeholder group for the following year.

The policy and the renewal process reflect the Quebec government's focus on progress reporting and planning to address the evolving economic, environmental, and social conditions impacting provincial food production and food security.

Indigenous Economic Interests in the Regulated Marketing Sector

BCFIRB notes that the 2004 Policy does not specifically refer to Indigenous economic interests in the regulated marketing sector, and recommends that this be a consideration for Policy renewal.

BCFIRB recognizes the BC government's continued commitment towards Indigenous reconciliation and has met with senior Ministry leadership to learn about Ministry efforts to identify food security and economic development opportunities in partnership with Indigenous Peoples and communities.

As an administrative tribunal and provincial supervisor, BCFIRB is committed to supporting Indigenous reconciliation within its mandates. BCFIRB's Strategic Plan identifies potential opportunities to support Indigenous reconciliation as well as priority actions, as noted below.

Opportunities to Support:

*"The BC government continues to work with Indigenous peoples and communities to support reconciliation, particularly with addressing barriers to participation and economic development and food security needs. **BCFIRB will continue to expand our understanding of Indigenous economic interests in BC's regulated agriculture commodities, including opportunities to collaborate with the Ministry of Agriculture and Food and the BC Indigenous Advisory Council on Agriculture and Food to consider how BCFIRB's supervisory role in regulated marketing can assist in addressing those interests.**"*

Related BCFIRB Priority Actions:

1. *Meet with the BC Indigenous Advisory Council on Agriculture and Food to better understand economic interests of Indigenous peoples/communities across regulated agriculture commodities.*
2. *Recommend the Ministry of Agriculture and Food review the 2004 Regulated Marketing Economic Policy to guide and support Boards and Commissions on sector factors and challenges such as disease and biosecurity, climate change and disaster events, food security, Indigenous reconciliation, and agricultural land protection.*

BCFIRB is in the early stages of this important work: learning and understanding through education, training, and engagement. However, including government interests and expectations with respect to Indigenous economic interests and reconciliation within the regulated marketing sector – through a renewed Policy – would provide guidance to commodity boards as they work to address challenges and opportunities across the sector, including through new entrant programs that provide opportunities to new producers.

BCFIRB urges the Ministry to consider how a revised Policy could align with the Ministry's commitment to Indigenous reconciliation and inclusive economic growth, and how the Policy renewal process itself could be designed to support this important work.

Process Recommendations for Policy Review

In recommending the Ministry review the 2004 Policy, BCFIRB strongly advises that the following renewal actions be considered to support a modern and priority-focused renewed Policy:

- **Comprehensive Consultation:** We note the Ministry is engaged in a system-wide consultation process via the Premier's Taskforce on Agriculture and Food Economy. We recommend the Ministry consider a similarly inclusive approach to reviewing and renewing the 2004 Policy so that it includes the experience and perspectives of the commodity boards and other key regulated marketing system stakeholders as well as the provincial government and Indigenous partners.

While BCFIRB's *What We Heard Report* contains preliminary considerations from the commodity boards on the review of the 2004 Policy, comprehensive consultation by the Ministry with the boards, including in the design of the consultation process itself, could provide greater insight to the Ministry.

- **Ongoing Engagement for Policy Renewal:** BCFIRB recommends the Ministry develop a plan for ongoing, annual engagement as part of the Policy Renewal process to tangibly address the changing environmental and economic impacts to BC's food system and the security, sustainability and profitability of the regulated marketing sector. The sector has faced catastrophic events and

changes in recent years, and future unknowns are expected to increase. Ongoing dialogue will help address new challenges and help regulators, stakeholders, and government plan and track progress on key efforts to ensure they are aligned and targeted to achieve best outcomes. Supply chain/system engagement, especially if it is part of an annual review cycle, will help identify new opportunities for system-wide innovation, partnerships and growth for the regulated marketing sector.

On behalf of BCFIRB, I am pleased to provide this Recommendation to the Ministry. I look forward to discussing it with you in the near future and how BCFIRB can support the Ministry in its Policy review/renewal process.

Sincerely,



Gunta Vitins
Chair

BC Farm Industry Review Board

Cc: Michelle Koski, Deputy Minister, Ministry of Agriculture and Food (AF)
Eric Kristianson, ADM, Science, Policy & Inspection Division, AF
Willow Minaker, ADM, Agriculture Resource Division, AF
Paul Squires, ADM, Climate Resilience, Competitiveness & Reconciliation Division, AF
Bill Vanderspek, Chair, BC Broiler Hatching Egg Commission
Kevin Klippenstein, Chair, BC Chicken Marketing Board
Stephanie Nelson, Chair, BC Cranberry Marketing Commission
Al Sakalauskas, Chair, BC Egg Marketing Board
Bonnie Windsor, Chair, BC Hog Marketing Commission
Janice Comeau, Chair, BC Milk Marketing Board
Wes Shoemaker, Chair, BC Turkey Marketing Board and BC Vegetable Marketing Commission
Martha Anslow, Executive Director and Registrar, BC Farm Industry Review Board
BCFIRB Website