



**Supervisory Review:
The Future of Regulated Marketing on
Vancouver Island**

What We Heard

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Feedback Participation

An open invitation was sent by e-mail as a bulletin in September and in our August and December 2015 News Letters to the BC Vegetable Marketing Commission's Agencies, Growers and Stakeholders on our member distribution list. The invitation was also published on the BCFIRB website and in the November 2015 edition of the Country Life in BC Newspaper.

We received written feedback from all Storage Crop Agencies located on Vancouver Island and in the Lower Mainland. Other industry stakeholders in the BC Vegetable Industry also provided individual written comments.

Notes about the Document

The purpose of this document is to capture all the comments and opinions received by the Commission over Stage I of the Supervisory Review. It presents an overall picture of what we heard from stakeholders. It reflects feedback and ideas brought forward from the informal round table discussions held with each Agency on Vancouver Island and the Lower Mainland, and the written submissions received by the Commission.

*For background on the information provided in this document, please refer to the **['Vancouver Island Supervisory Review Brief - Introduction'](#)** (PDF) and **['Vancouver Island Supervisory Review – Discussion Paper'](#)** (PDF).*

WHAT WE HEARD SUMMARY

The submitted feedback is presented in bullet points.

This feedback is then organized by theme. The descriptive in bold that is placed above a comment / group of comments is the observation that requires follow-up.

THEME 1: Industry Vision

Vision for Vancouver Island

- Continued growth in all sectors of agriculture (field, root, greenhouse and livestock) for islanders to continue to move forward in their ability to feed themselves.
- All growers, both regulated and non-regulated, are a significant and essential part of strategic growth for the agriculture industry on Vancouver Island. The vision is that of a united group of growers committed to producing a variety of premium-quality products while receiving fair returns, allowing for re-investment in farms, infrastructure, and production capabilities. We want agriculture to continue to survive and flourish on Vancouver Island.

Vision for the BC Vegetable Industry

- Vision for the BC vegetable industry is one where growth is promoted and new growers are encouraged and provided assistance wherever possible.
- With the recent weather changes along the west coast of North America, BC vegetable growers need to prepare to expand their production and product offering as more and more areas of Canada and the United States will look to BC as a major producer of vegetables and fruit.

THEME 2: Vancouver Island Market Demand

- The regulated system has been effective for pricing & delivery allocation in root crop; however, delivery allocation really is a non-issue on Vancouver Island as demand for Island-grown product far exceeds supply in pretty much every category.
- Why is there this position of “increased complexity in the retail environment” when, in our experience, it hasn’t shifted to any great degree? If this question is referencing consolidation or centralization within larger retail companies, we can see the trend to some degree; however, Island stores, whether independent or larger retail chains, all have local buying programs with Island buyers and Island supervisors in place in which we play a significant role.
- The challenges to be competitive in the vegetable industry are no different than in any other region across the country.

- Vancouver Island consumers are unique in that they are fiercely loyal to their Island through goods & services, food production, independent businesses, etc. What has occurred with the competition (imports, retail consolidation, and direct entry of large retailers), is that they have realized their continual need to support, promote, pay local producers fairly, and expand their commitment to Island production and consumption. We meet often with the main players and stakeholders in retail, who provide us with constant information relating to trends and needs.

THEME 3: Vancouver Island Production

- We do not believe that there are any more or any less major barriers facing production on Vancouver Island than any other BC region or across the country.
- Would involve significant financial aid for potential growers, and working with Island colleges and universities to educate & train the next generation of producers.
- Land costs are by far less expensive on Vancouver Island compared to the lower mainland, with thousands of acres recently being purchased for beef production organic farming.
- Production input costs on Vancouver Island are higher due to some transportation of goods through the ferry system, but to a degree that it is prohibitive is not correct.
- We typically have the highest returns to our growers, to offset any measurable costs. In terms of marketing and establishing a sales & management team, those costs are no more than any other region, and most likely are cheaper due to lower commercial real estate values (office). For the Island vegetable industry, 99% of production stays on the Island.
- The Island has current producers that have functioned for decades on economies of scale that through the years of tweaking and streamlining of operations and logistics are as or more efficient than producers located on the lower mainland.
- The outlook in the current circumstances is less favorable for the Vancouver Island vegetable sector. People in the industry admit that product that would normally be considered unacceptable is only allowed to be received because it is local. This is not a good place to be. The sector's opportunities to strengthen is in improving its quality and network of growers. Once it has a stable supply of the commodities spread out over a number of growers in different areas to cover the growing season, the sector would be better to sell and represent its growers.

A need for increased supply of regulated product in Vancouver Island Market

- Production of regulated vegetables and the number of regulated vegetable growers on Vancouver Island has been in decline for 25-years. This has transpired despite everyone's best efforts and having the advantage of a regulated system. The regulated industry, by any metrics, is not expanding and has been steadily shrinking.
- It's a matter of matching new, willing and able growers with affordable, available land. Land is expensive in BC, and farming is physical work. We no longer see the younger generation following in the farming footsteps of their parents and grandparents, thus creating a situation of an over-abundance of land and a shortage of growers.

- There is currently an unlimited amount of available agricultural land on Vancouver Island. In the Comox Valley there are at least 3 large parcels of agricultural land totaling over 700 acres currently not in production.

Orderly Marketing on Vancouver Island

- The current regulated system neither hinders nor helps the future of commercial vegetable production and marketing on Vancouver Island.
- The regulatory system has no influence on a potential Island agricultural investor. Vancouver Island currently supplies just 8% of consumption. There is no question of being able to move product as a new producer given the current demand to supply ratio. The regulatory system as it is today, does provide some history and predictability in regards to root crop pricing, but nothing else for overall potential vegetable production investment.

THEME 4: Vancouver Island Marketing Promotions

- Collective marketing has been established throughout the Island & province in the past “Buy BC”, Island Farmers Alliance, etc. Regional and micro-marketing is the most effective and productive model; therefore, funding for such promotions of Island products would potentially strengthen marketing; although Vancouver Island, being separate from the mainland, already has a strong allegiance to Island-grown items, and demand far outweighs supply.

THEME 5: Orderly Marketing of BC Vegetables

Agencies Serve a Purpose in Orderly Marketing

- Agencies provide a stable and consistent approach to marketing Island agriculture. They have been a long-standing and well understood component of marketing on Vancouver Island. They enable customers to purchase product from multiple growers with a single contact. Agencies have established contacts, relationships, networks and various avenues of marketing product for Vancouver Island producers.
- Agencies (including Agencies on Vancouver Island) are an effective marketing tool for BC producers as they protect them from the larger buyers in the retail trade that can cause growers to lower their pricing. The agencies provide the necessary buffer between growers and buying groups.

How many Agencies are required on Vancouver Island?

- There are many growers in the lower mainland that are larger than the entire Vancouver Island regulated vegetable industry combined, and they successfully market through a single Agency. Why does Vancouver Island, with 5% (or less) of the provincial volume require three Agencies?
- There was at one time only one agency on Vancouver Island, then there were three, then there were two and now there are three again. The model that was the most ineffective was having only one agency due to the different approaches to marketing in different geographical areas.

- All marketing of regulated produce should be done by one agency on the island located in the Duncan area. Duncan and Victoria is where most of the customers are located. Agency would have good access to customers from this location.
- The Vancouver Island's commercial vegetable sector is hindered by its size and product offering. The current regulatory system is a good start but does need to be adapted. I would propose having growers from both the island and the mainland spread between two agencies to give each agency a broader and more equal reach. With pricing being a non-issue due to regulated minimums, the factors to strive for would be quality, variety and service level.

How Many Agencies are required in the province?

- I think that there should be 3 agencies. Due to the size of the market in the lower mainland and the proximity between the island and the mainland, there should be two between the island and the mainland. I believe this would allow for each agency to have a large enough grower base to have a consistent supply of product with more equal access to potential customers. I have limited experience with the agency in the Okanagan but given its smaller, more isolated nature, it makes sense to leave it as one separate agency.

Agency Accountability

- A fair balance between competition and friendly collaboration between all agencies would benefit everyone. If all agencies have the concept of orderly marketing and the best interest of the grower in mind, success for all growers will result. Agencies could/should communicate shortages and long situations between each other and co-ordinate. I believe that the current trend in the demand for local product can put agencies at an advantage if they would allow it. All customers have a need to source local produce.
- Sound marketing policy is a principle we adhere to. BCFIRB's description of sound marketing policy to us was "is it working?" to which we can confidently respond Yes, it is working. Our Vancouver Island Agency is successfully marketing vegetables according to the Commission's General Orders, while getting the grower the best return possible with the lowest fee structure in the industry.
- Vancouver Island production should be the mandate of a Vancouver Island based Agency.
- We, an Agency on Vancouver Island, have complied with the General Orders of the Commission. We have been working according to BCFIRB's own definition of "orderly marketing" and "sound marketing policy". ...we are requesting that the Commission and BCFIRB let us continue, and to focus on doing what we have set out to do, and have successfully done thus far. We have established ourselves as a significant part of agriculture on the Island, and have plans and commitments to continue as such.
- There is an issue when the line blurs between whether an agency is operating as an agency or as a wholesaler. Agencies were created to provide the best possible return for their growers. When an agency has a dual function as a wholesaler; profitability to its shareholders becomes the priority and not necessarily the movement of its growers produce. Regulation provides the necessary direction to ensure this does not occur at the expense of the agency's growers or other BC growers but it needs to be enforced.

- Agencies should be able to act as a wholesaler - it takes our growers one step closer to the consumer which of course can benefit our growers. It simply needs to be monitored to prevent abuses generated from pressure to create higher profits for a small group of grower / shareholders or the potential for use of an agencies position in setting market prices for the purpose of manipulating prices for products being imported for wholesale purposes.

BCVMC Governance

- The notion of ongoing conflict and threats to orderly marketing on Vancouver Island should have long been put to rest by the evidence of success of all agencies involved. The Commission's handling of the new agency application process is what has created the illusion of instability and uncertainty in orderly marketing on Vancouver Island.
- A principle in administrative fairness and natural justice is for issues to be mitigated within a reasonable amount of time. Timelines by the Commission were not met or enforced and some orders and decisions were enforced while others sat without compliance.
- Other than the recent quota transfer rule changes, the current regulatory system does provide predictability for both growers and value chain members to invest in BC vegetable production and purchasing.
- The current regulatory system with a fair and unbiased BCVMC would provide flexibility to service the existing and future retail environments.
- The current regulated system does not hinder the future of vegetable production and marketing in BC. Issues which we are currently facing in regards to the central Vancouver Island marketing agencies could have been avoided had the BCVMC simply followed the guidelines provided within the Vegetable Marketing Scheme and General orders. The Scheme and General Orders as it stands - minus the recent Delivery allocation transfer changes is very solid and was well thought out.
- The future is bright for BC vegetable producers provided the BCVMC and its structure are changed to fairly represent all agencies and growers in BC and to focus on growing our industry, our markets and re-establishing a healthy relationship with all BC growers and their agencies.
- Do not believe or want changes to the current regulations or orderly marketing structure simply to address one issue (i.e.) between two agencies on Vancouver Island. Instead, let this be an opportunity to address all the issues facing BC growers, agencies and regulatory bodies.
- From our perspective the issues of the past on Vancouver Island have stemmed primarily from weakness at the BCVMC, examples of this include:
 - The inability of the BCVMC to follow proper procedures and general orders lead to the creation of a third agency on Vancouver Island
 - BCVMC did not follow through on FIRB recommendation in a prompt manner following appeals
 - BCVMC approved the application for a sub-agency on Vancouver Island. To our knowledge this business model never came to fruition and has since been dissolved with no consequences to either party and no further information provided to other participants in the hearing.

- Inconsistency at the BCVMC has led to disillusionment and uncertainty among growers, with that in mind we feel that the greatest opportunity for Vancouver Island and the industry as a whole is a stronger BCVMC that follows through, is unbiased, and protects all grower's interests.
- We have pointed out on several occasions over many years that the current system is broken and in serious need of repair, it is our hope that this review will finally lead to some positive changes.

Suggestions to consider:

- Stronger enforcement of the general orders and more independent investigation related to hearings and appeals.
 - BCMVC should be providing more independent information rather than constantly relying on information provided by Agencies. Agencies are an independent corporation that is in competition with all other agencies and as such would have incentive to provide limited or even misleading information to its competitors.
 - BCVMC should be tracking product that agencies are importing from the US. This will give better information as to actual market conditions and will help to limit any quota allocation issues. It will also help to prevent agencies from importing US product when local supply is still available.
- The BCVMC Marketing Board and the biases that it represents are a barrier. Its efforts should be to increase the marketability of BC grower's product. To be successful the BCVMC needs to once again gain the trust of all BC growers and agencies.
 - A regulated industry is a privilege, not a right. In exchange for the ability to set prices and operate an orderly marketing system, there is a trade-off that comes with basic regulation, rules, and administrative fairness. We must also balance that with a common sense approach to ensure the supply chain is not impeded by senseless bureaucracy.
 - The time for resolution of some long-standing issues is now. Failure to do so will result in irreparable damage to the confidence of the orderly marketing system. A permanent resolution to the orderly marketing structure is critical. The amount of time and resources spent dealing with internal industry issues the past few years has caused the industry to lose focus and prevented it from moving forward.

Should the Commission exercise more control over planted acreage?

- The Commission also needs to explore a mechanism to create some semblance of integrity between a grower's acreage and their Delivery Allocation. We all understand that for the industry to grow, production should increase to meet the increase in demonstrated demand. However, when a grower plants acreage far in excess of their Delivery Allocation, it will inevitably end up in the market competing with other Agencies and their growers throughout the marketing season.
- There is never a perfect system, and growers will always find loopholes. But if the system has no integrity what value is it to the industry and why should the industry pay to continue to support it?

Commission Structure

- There has been a criticism of the Commission structure and decision making process. Every time a decision does not go in favour of one party or the other, allegations of unfairness abound.
- Commission representatives from each agency or alternatively a limit to the % of the commission members from a single agency.

- All Commissioners are charged with making decisions based on the best's interests of the industry and the allegations have been unwarranted.
- It is time for the Commission to appoint one more independent Commissioner (in addition to the appointed Chair) to ensure transparency in the decision making process.
- The industry cannot return to the previous structure where less than 10% of the industry was having an unfair impact on policy decisions for the other 90% of the sector. Some restructuring of the Commission Board of Directors is needed that will provide additional transparency, eliminate the finger pointing, and move the industry forward with integrity.

Role of a Designated Agency in the Orderly marketing System

- In the context of a Vancouver Island Agency,
 - Is it their role to assess the market for regulated vegetables grown on Vancouver Island, and then attract and expand the production to fill that market by increasing Vancouver Island production; or,
 - Is it their role to expand production in the lower mainland to serve lower mainland accounts; and thereby, create an opportunity for growers bypassing the Delivery Allocation system?
 - The two Agency roles outlined are two very different objectives.
- Intentionally or not, upon the removal of districts, the opportunity for a grower to market through any agency they wish has created opportunities for growers based in the lower mainland looking for a way to bypass the existing Delivery Allocation system by signing up with an Island based Agency. The product is not destined for Vancouver Island but instead is competing and displacing existing lower mainland growers who have earned their Delivery Allocation by serving the market over time.
- The Commission needs to review the role of Agencies and determine how many are actually required for the industry to remain viable. The Commission should also determine the minimum amount of volume (tons and/or cases) that is required to operate an Agency successfully. This exercise would be prudent in determining future Agency applications as well.

Delivery Allocation – Management of a Grower's Access to the Market

- Is the integrity of the Delivery Allocation system impaired by the current Agency managed Delivery Allocation system? The current system was implemented after the removal of Districts. The only other choice was to implement a Provincially based Delivery Allocation system which was deemed too cumbersome at the time.
- Regardless of the outcome of the Regulatory Review, the Commission needs to start implementing its procedures under Part XV or Part XVI of the General Orders and conduct due diligence prior to making decisions on the transfer of Delivery Allocation and the requirement for an Agency to demonstrate market requirement for additional product.
- If the Commission would utilize this process as it was meant to, it would create more market research by Agencies to justify their expansion activities or their ability to absorb Delivery Allocation Transfers. This in turn would create some comfort for existing growers that their "market share" was not being unfairly eroded and the Commission was providing the necessary supervisory oversight.

- The Commission needs to undertake some legitimate due diligence to make sure there is a market for any new or additional delivery allocation. They need to consult with all Agencies and producers to prevent abuse of delivery allocation to one's own personal benefit at the expense of the industry. This process needs to be undertaken regardless of any decision on the Vancouver Island Agency structure.
- Many small growers and even larger growers have the desire to expand their vegetable production. The BCVMC has unfortunately made it more difficult for the growth to occur. These difficulties include things like the recent changes to the quota transfer rules.
- The Commission needs to track Delivery Allocation Vs Shipments. Need to know if a grower has shipped and does not have Delivery Allocation.

Manifest Sales

- Manifest sales provide an opportunity for producers to cause instability in the market place. They are also difficult to monitor. All sales should be managed directly by Agencies.

THEME 6: Pricing

Vancouver Island Pricing

- As a result of demand far exceeding supply, Vancouver Island producers are not price takers and are able to set pricing as well as assure quality due to quick turnaround times from picking, packing to shipping. Quality of products meets or exceeds that of competitors and/or imported product.

Industry Price setting

- I see a need to change the pricing structure currently used. Right now, 1 minimum price is set for each commodity and each agency can sell to each level of the value chain. Currently, agencies can and do sell direct to farm markets for the same price as they do to wholesalers and retailers. I can see a need for three ascending pricing tiers: Packers, retailers / wholesalers and direct to store / market. Packers and agencies sell to retailers / wholesalers, retailers / wholesalers sell direct to store. Having agencies going around their customers and selling directly to their customers' customers for the same price both decreases the volume that the wholesalers and packing facilities can sell and thus purchase from the agency.

THEME 7: Vancouver Island Marketing & Distribution System

- The Agencies work without any difficulty in accessing large distribution networks and are in compliance with the labeling, quality, traceability and food safety requirements of Canada's largest retailers including Loblaw, Sobeys and Save-On Foods, as well as with the growing number of independent retailers on the Island.

- The Vancouver Island market is said to be the most highly concentrated number of independent retailers in North America. It requires that we work within a geographical range and pair stores with nearby farms. Retailers understand the desire of Islanders in having access to Island-produced food, and are therefore more than willing to work with both agencies and producers in order to provide this local product for their customers.
- Growers would benefit from having their respective agency being able to offer a full variety of commodities (especially when selling to the big chains) throughout the local season. The agency would be better able to establish their customer base if it became unnecessary for a buyer (customer) to search for commodities from other sources.
- As a buyer, the current regulatory system does provide for some predictability in terms of the fact that I have a good idea what to expect in terms of costing on a product, however, as a customer of a smaller Agency, due to its limited grower base my sourcing options are quite slim and if there is any issue with product quality or supply I can run into a situation of being short.
- Due to the island's limited, fragmented grower base, as a buyer I feel that it does not allow for flexibility. Items go from available to unavailable without warning making quoting further ahead as needed by customers. A limited variety offering reduces the ability to meet requirements for more unique, higher value products. The regulatory system, as the body that is in contact with the customers can guide the growers as to what varieties are in demand.
- Agencies are an effective marketing tool for Vancouver Island producers and value chain members. It's good to have a facility that can handle all aspects of moving the growers' product – allocating sales, quoting, logistics, claims/service. This would be a cumbersome task that would lead to pricing issues between growers as each grower ends up trying to move his crop. It would essentially lead to growers being competitors with one another.
- The fragmentation of an already limited growing area limits the island's ability to co-ordinate crops to best supply customers with as many commodities as possible for as long a season as possible. Having such a small growing area is limiting as well. Island growers would benefit from having mainland growers to work with to lengthen the timespan that the Island's agency(ies) can offer product to customers. This would enable agencies to offer a longer, more stable season to customers, increasing the number of customers an agency can acquire.

THEME 8: Working Together to Grow the Industry

We are all competing for the same market

- BC growers should not be fighting with each other and competing over the same markets but that we should lift our sights to a higher horizon.

Decisions should be based on what is best for the Industry

- Despite the common sense approach of consolidating, the industry has fractured further. Maintaining the status quo would be irresponsible. The existing Vancouver Island Agencies and remaining growers must find a way of working together to redevelop the island sector or consider legitimate alternatives. It is the Commission to do what is best for the industry.
- The barriers outlined in the discussion papers are not unique to Vancouver Island and are barriers that face all vegetable industry stakeholders regardless of their geographic location. For this reason we believe that the BCVMC should be taking a holistic view of the situation, and looking at ways to better support all industry stakeholders.

Marketing BC Product beyond the Regulated Area

- BC growers and marketing agencies should be looking outside of BC's borders for new markets to expand and to grow.
- By encouraging growth and expansion amongst BC vegetable growers and increasing the variety of products produced; there is an excellent opportunity to expand sales not only in BC but outside our borders.
- A healthy BCVMC would actively promote the sale of BC produce outside of BC's borders.

THEME 9: Restructuring Options for the Commission to Consider

Single Desk Selling for Vancouver Island

- The Vancouver Island Agencies could be consolidated into a single desk. The successful Agency could be directed to develop a Vancouver Island grown strategy and redevelop the Vancouver Island regulated vegetable sector. The Agency would be held accountable to this mandate.
- The Commission could solicit Agency applications from the three existing Agencies with the understanding that there will be a single Agency for the 2017 season. The Commission can select the application that is the best business model for Vancouver Island and is the most inclusive of the existing growers.
- By creating sufficient critical mass under a single Agency a more robust growing and marketing strategy could be developed and executed for Vancouver Island. Having sufficient growers within the Agency will also create a more self-regulating Delivery Allocation system.

Deregulation

- Deregulation must be considered as an option. If the Vancouver Island sector was to deregulate, what would realistically change?
 - Minimum Pricing on Vancouver Island would be largely unaffected due to the real cost of transportation from the lower mainland.
 - The existing Delivery Allocation system in place on Vancouver Island that would not be impacted as it is currently Agency managed.
 - There are only three potato growers. The existing growers could continue to sell through the same marketing channels as they do now.
 - There would not be any increase in new competition from lower mainland growers as they have already had the opportunity to establish operations on Vancouver Island for several years but have elected not to do so.
 - There is not a lot of downside considering the ongoing friction under the current system.

Partial Deregulation

- Under partial deregulation, Vancouver Island storage crop producers could be exempted from marketing through a Designated Agency which would eliminate the need for Agencies altogether.
 - The VMC could decide not to license any Agencies on Vancouver Island and just eliminate the need for them. The current Agencies could still remain sales and marketing companies for product grown on Vancouver Island, but not licensed Agencies of the VMC. Marketing channels would be unchanged and unaffected.
 - The elimination of Agencies could be for a period of time for trial purposes or until such time as the industry can agree to work together under a single desk in the future.
 - Producers could market through any existing sales company located on Vancouver Island and all business relationships would be by mutual consent.
 - Producers could still be required to be registered with the VMC, pay levies, and could be required to submit their tons sold each month for records purposes.
 - Producers could be required to follow the weekly minimum price list published by the VMC.
 - As there would be no licensed Agencies on the island they could not purchase regulated product from producers located off of the island and the opportunity for circumventing agency managed Delivery Allocation could be eliminated.

Creating Two Districts

- Some of the current friction on Vancouver Island could be eliminated if they became a separate District from the rest of BC.
- The Provincial Government mandated in 2007 to reduce regulation in the sector by eliminating Districts. It has not resulted in increased production on Vancouver Island. Instead, it has only created opportunities for lower mainland growers to do an end run on the Delivery Allocation system through an Island based Agency. Creating two Districts will not solve the issue of the marketing structure on Vancouver Island but it could provide some orderly marketing benefits coupled with a Single Desk Agency on the island.

Provincial Delivery Allocation

- When Districts were eliminated, this option was looked at extensively as an alternative to Agency managed Delivery Allocation. There was a precedent in the 1990's when there were two Agencies in District I and the Commission of the day tried to ensure that the Delivery Allocation system was managed fairly on a District basis between two separate selling Agencies. It proved too difficult to manage and the Commission eventually opted to return to a single desk in District I.
- A Provincially managed Delivery Allocation system between multiple Agencies would be cumbersome. There would be insufficient reaction time to meet market requirements.
- In today's world, marketers must be flexible and yet robust. You must be able to pack under multiple private labels which also require multiple food safety audits to meet the demands of the market. Imposing a cumbersome Delivery Allocation system in the middle of today's supply chain is likely impracticable.

THEME 10: The Role of FIRB

- We need to work with FIRB to ensure that their Supervisory oversight of our regulated industry is rarely appealed to for resolving regulatory issues in our industry. All too often, FIRB has been involved to settle disputes between Agencies and growers. Our Orderly Marketing System needs to serve the protocols of SAFETI and also ensure that common sense and efficient decision making is maintained and implemented within this structure.
- The benefits of regulation under FIRB oversight have been offset by the amount of unnecessary time consuming Appeals, the cost of these same Appeals, and the amount of time it takes for FIRB to render a decision and direction back to the industry.
- Once the current Regulatory Review is complete we want the industry to move forward without the need for FIRB's constant involvement.

The Next Phase

The objective of the Supervisory Review is to define a clear shared vision for the regulated vegetable sector on Vancouver Island and to explore the strategies available to achieve it.

From the feedback received in Stage 1 of the process, it is evident there are stakeholder concerns about the overall current regulatory structure and Commission governance, along with specific Vancouver Island issues. As the Review proceeds, the Commission will continue to assess and communicate how these larger picture concerns will be addressed and their relationship to the future of the regulated industry on Vancouver Island.

The next phase of the process is Stage 2 - Joint Problem Solving. Workshops will be organized on Vancouver Island and in the Lower Mainland.

The workshops are to be moderated by a third party. A drafted vision will be presented. Discussions are to focus on solutions to the issues brought up in the What We Heard document. Restructuring options will also be presented for participants to work through the implications. The objective of the workshop is to engage participants and ensure there is good dialogue on feasible solutions.

Upon completion of the workshops, the Commission will develop and apply evaluation criteria based on general S.A.F.E.T.I. based principles to assess the options and feedback heard in Stage 2. A recommendation will then be made to BCFIRB. The Commission decision and rationale will also be posted to the Commission website. The intention is to have the decision submitted to BCFIRB by the end of March 2016.