

Natural Products Marketing (BC) Act Mandatory Notifiable Avian Influenza Insurance Review

*Phase 5 Report
What is the most appropriate risk transfer
mechanism that meets the BC need?
November 3, 2017*



Natural Products Marketing (BC) Act

Mandatory Insurance for Registered Poultry Producers

Phase 5 Report – What is the most appropriate risk transfer mechanism that meets the BC need?

Executive Summary

This Report is the final of the five-phase Review. The conclusions drawn in the previous phases have required the scope of this Phase to be modified. Phase 3 concluded that the boards and commission could internalize the cost of infected premises C&D through the existing levy system and recommended that the boards and commission not secure the enabling authorities under the *Natural Product Marketing (BC) Act* to require producers to maintain insurance against disease losses. Given that the conclusion and recommendation addressed the intent of the Review to answer the question of need for mandatory insurance, it remained important for the boards and commission to complete the full five phases of the Review. The completion of the Review would identify the appropriate actions to ensure the timely return to a system of orderly marketing following a Notifiable Avian Influenza (NAI) discovery and to effectively manage the financial burden of the extraordinary cost of infected premise C&D.

The original focus of Phase 5 was to address what mandatory insurance delivery mechanism is appropriate for the BC poultry industry. The focus has shifted to examine the most cost effective and efficient approach to risk transfer for the Fund. This analysis is crucial to ensure a predictable and sustainable response to future NAI discoveries.

The Report considered three options, individualized insurance coverage; a group funded deductible; and a captive insurance company. As the 2017/18 “flu season” has commenced, it is important for the boards and commission to make the decision to put in place as a minimum, a collective industry-wide Infected Premises C&D Cost Recovery Fund. To protect and enhance the Fund and minimize the overall cost to the industry, it is recommended that the boards and commission initiate action to establish a group funded deductible. This approach provides a good starting point for the boards and commission to “insure” losses resulting from future NAI discoveries. It allows the Fund to operate through a fronting licenced insurance company to access reinsurance that provides excess loss coverage and protects the initial capital. The boards and commission would benefit from engaging a part-time administrator to facilitate the actions flowing from the recommendations.

Continued pursuit of the captive insurance company option is important and is recommended as a follow-up action. It provides significant strategic value to the BC poultry industry at an annual cost that is similar to that of a group funded deductible. The legal questions regarding the enabling authorities for the boards and commission to own and operate an insurance company remain and need further exploration.

The Report identified potential sources of seed funding to establish the group funded deductible; the federal/provincial AgriRisk Initiatives Administrative Capacity Building. It is recommended that the boards and commission work with the Province of BC to further explore the funding.

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Expected Outcome

The poultry boards' and commission's due consideration of options to effectively and efficiently transfer the risk of establishing and maintaining a collective Infected Premises Cleaning and Disinfection Cost Recovery Fund (the "Fund") to cover the costs of cleaning and disinfecting (C&D) infected premises following a Notifiable Avian Influenza (NAI) discovery as an integral part of returning the regulated poultry sector in BC to a system of orderly marketing in a timely manner.

Introduction

The passing of the amendments to the *Natural Products Marketing (BC) Act* (the "NPMA") in May 2015 made explicit the authority of boards and commissions to require producers to maintain insurance against losses resulting from the interruption or termination of production for any reason or for a notifiable or reportable disease. The regulated poultry boards and commission have given due consideration to the enabling authority and collectively agreed in January 2016 to initiate the Mandatory Notifiable Avian Influenza Insurance Review (the "Review"). The purpose of the Review is to conduct the requisite due diligence in accordance with the SAFETI¹ principles for each board and commission to make a decision on whether or not to implement mandatory insurance requirements to address the financial consequences of Notifiable Avian Influenza (NAI) discoveries in British Columbia.

In March and April 2016 based on the Phase 1 and Phase 2 reports, the regulated poultry boards and commission affirmed the following:

1. Support the arguments put forth that it is in the interests of sound marketing policy to intervene and commit financial support to off-set the extraordinary costs of infected premises cleaning and disinfecting (C&D).
2. Agree that all licenced poultry producers realize the benefits of the boards and commission assuming the extraordinary costs of infected premises C&D and as a result further examine mechanisms to be put in place for all producers to share in covering the costs through seeding and maintaining a collective fund.
3. Support the continued exploration and analysis of the benefits and costs of risk transfer mechanisms that may or may not lead to mandatory insurance requirements.
4. Agree that the British Columbia Chicken Marketing Board (BCCMB) and the British Columbia Turkey Marketing Board (BCTMB) consider amending their respective schemes to ensure the express authority to use levy proceeds "to pay cost and losses incurred in marketing a regulated product" is included.

¹ SAFETI stands for the British Columbia Farm Industry Review Board governance principles; Strategic, Accountable, Fair, Equitable, Transparent and Inclusive.

In July, the boards and commission posted the draft Decision Note (Attachment 1) to establish a mandatory Infected Premises C&D Cost Recovery Fund (the “Fund”) to cover the extraordinary C&D for future NAI discoveries. As well, the boards and commission sent letters to industry associations and key stakeholders advising of the pending decision regarding the Fund and requesting feedback and comment.

The Phase 3 Report considered the options for managing the financial risk as well as examined the requirements of an insurance-based approach. It concluded that the cost of infected premises C&D meets the insurability test and an insurance product can be designed. It further concluded that the boards and commission could internalize the cost of infected premises C&D through the use of existing levy proceeds and not impact or effect the competitiveness of the poultry industry in BC.

The Phase 3 Report recommended that the boards and commission consider using a risk transfer mechanism, such as insurance to establish and maintain an Infected Premises C&D Cost Recovery Fund. The use of insurance will provide greater assurances to producers that the funds to cover infected premises C&D will be available when and as needed. The cost of an insurance based approach can be more cost effective, without affecting the competitiveness of producers and processors that a self-insurance Fund.

The Phase 4 Report identified and evaluated currently available insurance mechanisms and those under development. A comprehensive multi-disease insurance policy is currently available which includes up to \$100,000 coverage for cleaning and disinfection of infected premises. The available insurance policy provides an alternative for BC producers wishing to cover more than simply the cost of infected premises C&D. Insurance agents in BC, such as Valley Wide Insurance Service in Abbotsford are offering the insurance policy.

Poultry industry-led initiatives through the Poultry Insurance Exchange Reciprocal of Canada (PIE) and the Canadian Egg Industry Reciprocal Alliance (CEIRA) are in the final stages of developing and delivering a NAI insurance product. The finalization of the insurance product is dependent on the Canadian Food Inspection Agency (CFIA) establish a revised compensation formula for birds ordered destroyed under the *Health of Animals Act (HoA Act)* that would define the gap in ‘market’ value that is predictable and consistent upon which to base an insurance indemnity.

The Phase 4 Report concluded that there is no need for the boards and commission to secure the authorities under the *NPMA* to require producer to maintain disease insurance. Requiring BC poultry producers to maintain disease insurance through the use of existing available insurance products could affect the competitiveness of the BC industry. It is more cost-effective and efficient for the boards and commission to internalize the cost of infected premises C&D and pursue made in BC approaches to risk transfer mechanisms that are consistent with the BC requirements.

This Report is the final of a five phase Review. The current scope of this Phase has shifted given the findings of the earlier Phases. The original focus of Phase 5 was to address on what mandatory insurance delivery mechanism is appropriate for the BC poultry industry. This has shifted to examining the most cost effective and efficient approach to risk transfer for the Fund.

Background

The Phase 1 report – Why is a financial response needed, addressed the following questions:

- How to effectively and efficiently return the poultry industry to a system of orderly marketing?
 - Is a financial response necessary?
 - What other options/tools are available to the boards and commission?

Phase 1 concluded that a financial response was necessary to address the extraordinary costs of infected premises C&D. Irrespective of the type of operation that has contracted NAI the entire poultry industry in BC can be held in abeyance from returning to a system of orderly marketing if the financial burden of the infected premises C&D costs are not addressed in a proactive manner. An industry-wide financial response to cover or defray the extraordinary costs of infected premise C&D is required and is consistent with sound marketing policy. It supports the boards' and commission's ability to return the poultry industry in BC to a system of orderly marketing in a timely manner.

The Phase 2 report – Scope of a financial response provided the sound marketing policy rationale for mandatory requirements to effectively respond to a NAI discovery, with a particular focus on:

- Identifying gaps in maintaining a system of orderly marketing in the event of a major disease outbreak.
- Analysis of options for satisfying a system of orderly marketing.

The federal and provincial governments stated following the 2014 Highly Pathogenic Notifiable Avian Influenza outbreak that they would not consider future industry requests for financial assistance under the AgriRecovery Program given the recurring nature of NAI in BC. The stated government position and the absence of a coordinated industry-wide financial response leave the infected premise owner with the responsibility and financial burden for the extraordinary costs of C&D. To enable the timely return to a system of orderly marketing, the poultry boards and commission need to address the gap created by the federal and provincial government policy position to not support future use of AgriRecovery to cover the extraordinary costs of infected premise C&D.

While each board and commission has contingency funds, only the BCTMB has specified a commitment to the use of contingencies to self-insure to provide a contingency in the event of future turkey disease outbreaks. Further, the BCCMB and BCTMB regulatory authority is not explicit to the extent of those for the British Columbia Broiler Hatching Egg Commission (BCBHEC) and British Columbia Egg Marketing Board (BCEMB) in the ability to use levy funds to “pay for costs and losses incurred in marketing a regulated product”². While the risk of challenge of the lack of express authority has been assessed to be low, the potential for a successful challenge is high, particularly for the broiler and turkey industries.

The Phase 3 Report assessed the ability of contingency funds to address the gap and provide the necessary protection is currently limited due to the highly unpredictable nature of NAI and variability of actual funds in place by sector. NAI needs to be recognized and accepted as an on-going risk to be actively monitored and managed. In the event of back to back NAI discoveries and depending on the severity of the outbreak, current contingencies could easily

² *Natural Products Marketing (BC) Act*, section Section 11 (1) (o), Powers of marketing boards and commissions.

be depleted, requiring them to be replenished during a time of recovery and limited returns. Risk transfer mechanisms to manage the risk and ensure the availability of funds for infected premises C&D provide for greater certainty to producers at a lower overall cost.

The Phase 4 Report identified the extent of currently available disease insurance to BC poultry producers as well as products currently under development. While an insurance product to cover infected premises C&D currently exist, they must be purchased as part of a broader disease insurance policy that provides market loss and business interruption coverage. Adopting the requirement for licenced poultry producers to maintain disease insurance without the ability to purchase a standalone infected premise C&D policy would add significantly to the cost of disease insurance. Acquiring and implementing the enabling powers of the *NPMA* to require producers to maintain insurance against losses resulting from the interruption or termination of production for any reason or for a notifiable or reportable disease would not enhance the ability of the boards and commission to return to a system of orderly marketing in a timely manner following a NAI discovery. Implementing a mandatory insurance policy would add unnecessary excess premium cost to producers which could reduce industry competitiveness.

The Phase 4 Report recommended that the boards and commission not pursue acquiring the enable powers to require producers to maintain disease insurance. As recommended in Phase 3, the boards and commission should continue to explore risk transfer mechanisms to provide protection and enhance a collective Infected Premises C&D Cost Recovery Fund.

This Report will closely examine options for the boards and commission to transfer the risk of the Fund to enable a timely return to a system of orderly marketing.

Risk Transfer Options

Three options for risk transfer have been identified for analysis in this report.

Option 1 - Work with an existing poultry disease insurance provider

Phase 4 identified A10K as the insurance broker underwriting existing available poultry disease insurance. The A10K insurance coverage extends beyond the requirements of the Fund by covering market loss, business interruption and clean-up costs. The A10K product is designed for individual producers not for a comprehensive industry-wide policy through the boards and commission. It may be possible to consider A10K under Option 2.

The industry-led NAI insurance product development through PIE and CEIRA are not yet sufficiently advanced to be considered as a viable option at this time. In the future, should the insurance products become available the BC poultry industry could consider working with either or both. It is not known whether either of the reciprocals articles would enable them to act as a fronting insurer under Option 2.

Benefits

- Individualized insurance for poultry producers covering 4 poultry diseases.

Costs

- The BC industry as a whole would face higher costs in having to purchase insurance in excess of that required to return to a system or orderly marketing. Based on prior work in developing the BC Poultry Captive Insurance Company, the cost is estimated at three times that required to simply cover the cost of IP C&D.

Advantages

- Working with insurance companies with knowledge of poultry disease insurance.
- Potential to leverage existing capital or reinsurance cost.

Disadvantages

- Limited to nil ability to control or influence insurance product design, coverage and cost.
- Transfer of capital to parties outside of BC.

Option 2 – Establish a Group Funded Deductible

The traditional insurance model involves the payment of premiums to an insurance company and is treated as a direct expense to the insured party. A Group Funded Deductible is a custom designed strategy that enables the program members to create and maintain equity for the benefit of the BC poultry industry by retaining the ability to build net worth through the capital infused and annual premiums paid.

Establishing the Fund through defined and agreed up governance principles and operational policies and procedures, the BC poultry industry can parlay it into a group funded deductible, which would provide insurance to the members through the use of a licenced insurance company to front the insurance. The Fund is not required to be its own separate and distinct legal entity but will have to be managed by its members (the boards and commission) through a board of directors. The members would establish protocols regarding moral hazard and conflicts of interest. Governance protocols and the mechanics of operating the Fund would be defined, which in turn could be managed by a third party administrator. The administrator would be responsible for general administration of the Fund, including accounting, banking, actuarial, reinsurance and risk management and claims management.

The regulatory requirements and cost of a group funded deductible are typically lower than other risk transfer vehicles such as captives, reciprocals, mutual and federally licenced insurance companies (refer to BC Poultry Insurance Strategy, Group Funded Deductible, Guy Carpenter, October 2017). This is due to the fronting insurance company being the legal entity for purposes of providing the insurance.

- Issue insurance policies to the program members;
- Deal with regulatory filings;
- Pay premium taxes; and
- Secure reinsurance policies.

Benefits

- The Fund would operate through an existing licenced insurance company but would not have to be directly involved in addressing the regulatory requirements of a licenced insurance company.

- Provides a simple and fast approach to starting an “insurance” program that does not preclude future options and evolution that could include a BC poultry captive insurance company.

Costs

- The typical fronting fee is 5% of the gross insurance premium. If the annual premium for the Fund was \$200,000; the fronting fee would be \$10,000.
- Premium taxes of 4% would be payable from the Fund to the fronting insurer, \$8,000.
- Administrative costs of the fronting insurance company which would typically range from \$50,000 - \$75,000 annually, in addition to the fronting fee and premium taxes.
- Costs for the third party administrator; accounting, banking actuarial, claims adjusting, reinsurance and risk management services, \$15,000 – 20,000.

Advantages

- Low cost and relatively straightforward and quick to establish.
- Regulatory burden of maintaining an insurance company is shifted from the boards and commission to a licenced insurance company fronting the insurance in exchange for a fee.
- The Fund would not be required to pay tax on income.

Disadvantages

- Industry gives up significant control to the fronting insurance company, particularly as it relates to excess coverage and reinsurance and if the structure is such that the Fund is held by the fronting insurance company.
- May create some legal jeopardy if it is seen that the Fund is conducting an insurance business without a licence.
- The stability of the Fund can be placed in jeopardy in the event that one or more of the boards or commission decide to give notice and withdraw from the Fund.

Option 3 – Create a BC Captive Insurance Company

This option would see the boards and commission pursuing the creation of a BC captive insurance company, either through modification/amendment to the existing business registration of the BC Poultry Captive Insurance Company or establishing a new business registration. The existing authorities under the *NPMA* enabling the boards and commission to “own” and “operate” an insurance company have not been tested and would require legal opinion and BC FIRB direction. This may impact the viability of the option in the short-term, but does not preclude pursuit of the option over the longer term.

Benefits

The primary benefit to the BC poultry industry is the strategic value that it provides for the industry to address the financial consequences of managing disease risks. It could provide the logical next step in evolving a group funded deductible.

Costs

Through prior work done by the BC Poultry Association on the BC Poultry Captive Insurance Company Inc. with Aon Risk Solutions (a captive management firm based in Vancouver) has estimated the cost of managing the captive at \$63,500 annually which include administration, accounting, banking, and regulatory filings, including tax returns. Claims adjusting, reinsurance and risk management through a third party administrator would be additional costs over and above the captive management costs. These annual costs would be similar to that of a group funded deductible.

The difference in cost between this Option and Option 2 primarily rests in the additional costs of incorporating a captive; \$10,000 - \$15,000 and the annual costs to maintain incorporation.

Advantages

- Opportunity to leverage existing capital to the benefit of expanded coverage for the benefit of BC poultry producers, i.e. other important poultry diseases.
- Strategic value – ability to respond as necessary to continued evolution of the BC Poultry Risk Mitigation Strategy, i.e. enhance surveillance increasing the frequency of NAI discoveries; rapid response plan consequences with respect to compensation for birds destroyed prior to official CFIA confirmation of NAI and not covered under *HoA Act* compensation.
- The BC industry retains the majority of control over the insurance policies provided.
- The BC industry retains more control over retentions and the ability to keep more risk each year from premium infusions and reduce reinsurance purchased accordingly.

Disadvantages

- The legal/enabling authority for the boards and commission to ‘own’ and insurance company is not clear. Sound marketing policy rationale would be required and BC FIRB guidance sought prior to adopting this option.
- Greater regulatory requirements resulting from the need to establish and maintain a legal entity through which the insurance would be delivered.

Considerations

Legal

All three options would require the boards and commission to formalize the Fund through the establishment of governance protocols and the mechanics of operating the Fund. A legal structure is required to ensure accountability and transparency for all interested parties.

The group funded deductible does not require a separate and distinct legal entity to house the Fund. The captive insurance company would need to be incorporated under the *Business Corporations Act*. The captive insurance company option also carries an additional legal question of enabling authorities, do they exist for the boards and commission to own and operate an insurance company? What is the sound marketing policy rationale to support such action?

Financial

All three options require the boards and commission to commit funds to provide the initial capital to establish the Fund and annual “premiums” to support the Fund. It was concluded in Phase 3 that the contingencies and current levy structure of the boards and commission are capable of accommodating the financial requirements to establish and maintain the Fund. The annual administration cost of the Fund is similar between Options 2 and 3 which are greater than for Option 1.

There is flexibility within the group funded deductible and captive options for the boards and commission to address IP C&D for other diseases, however it would likely result in additional work and cost for reinsurance policies prior to being able to effect such a policy. The use of an existing insurer option covers NAI and three additional diseases.

The AgriRisk Initiatives has an Administrative Capacity Building (ACB) program component designed to provide assistance to establish and implement risk management tools. The ACB provides assistance for administrative costs as well as seed funding. The seed funding component is potentially a repayable contribution depending on performance of the tool. For example should the risk management tool experience losses in the first few years of operation and the continuation of the tool would be jeopardized with repayment of the government contribution the requirement to repay would be lessened. If the risk management tool does not experience losses and has built adequate reserves, the seed funding would have to be repaid in accordance with an agreed to repayment schedule over a specified period of time. To access the program, the boards and commission would be required to work with and secure the financial support of the Province to submit an application for joint federal/provincial funding.

Administrative

The complexity of administration increases progressively with each option. The use of an existing insurance company places the responsibility for the purchase of insurance on the producer resulting in the least amount of administration for the boards and commission. The boards and commission requirements under a group funded deductible’s administration include establishing a board of directors and a third party administrator; similar to that of creating a captive insurance company. The responsibility for maintaining regulatory compliance for the group funded deductible rests with the fronting insurer as opposed to being the responsibility of the industry owned captive.

It would be beneficial for the boards and commission to hire/appoint an administrator to direct and manage the Fund under Options 2 & 3. No administrator is required under Option 1.

Producer Acceptance

It is expected that producers are more willing to accept the boards’ and commission’s use of contingencies and existing levy structure to establish the Fund as opposed to requiring producers to maintain disease insurance. The MISC will be engaging the producer organizations through presentations on the Review. Feedback received will be directed to the boards and commission. As well, the boards and commission as part of the SAFETI process will engage producer organizations and industry stakeholders through direct notification of the Review results and recommendations to receive feedback and comment for consideration in the decision making process. The findings of the Review and the reports and supporting documents will be filed on the common Avian Influenza Insurance Review website <http://avianinsurancereview.com/>.

Conclusions

As the BC poultry industry enters the 2017/18 active flu season, there is a need for the boards and commission to make the decision to put in place a collective industry-wide Infected Premises C&D Cost Recovery Fund as early as possible. The Phase 4 recommendation for the boards and commission to not pursue the enabling authorities of the *NPMA* to require producers to maintain disease insurance provides further priority on the boards and commission to address the gap created by the federal and provincial governments no longer willing to support the industry cost of infected premise C&D through government programming such as AgriRecovery.

Should the boards and commission decide to establish the Fund, priority action is required on establishing and finalizing the Fund's governance protocols and operating mechanics. In parallel or as a subsequent action, the boards and commission should to hire/retain an administrator to work towards turning the Fund into a group funded deductible to secure the necessary stop loss reinsurance coverage that would ensure the cost of a catastrophic NAI outbreak can be covered to ensure a timely return to a system of orderly marketing.

The group funded deductible provides a good starting point for the boards and commission to "insure" losses. Given the similarities in administrative cost structure, as further follow-up action, work should continue on examining the feasibility of using a BC industry owned captive insurance company. The first step would be to seek legal advice and opinion with respect the *NPMA* enabling or precluding the boards and commission from owning and operating an insurance company. The examination and definition of the sound marketing policy rationale for should be undertaken with the intent of capturing the strategic value of an industry-owned captive in meeting the disease insurance needs of the BC industry.

The federal/provincial AgriRisk Initiatives ACB program provides an opportunity for the boards and commission to reduce the upfront capital and administrative costs to establish a group funded deductible.

Recommendation

Option 2 – Group Funded Deductible

The boards and commission should immediately commence work to establish the Fund and subsequently pursue the development of a group funded deductible to protect and enhance the Fund. To facilitate the actions required, it is recommended that the boards and commission engage an "administrator" to direct and manage the Fund. The boards and commission should initiate work with the Province of BC to determine the level of support for an application to the AgriRisk Initiatives ACB program for seed capital and administrative costs to reduce the start-up cost of the group funded deductible.

Despite the uncertainty with respect to legal and enabling authorities for the boards and commission to "own" and operate and insurance company, the strategic value of a BC owned poultry captive insurance company should not be lost. It is recommended that the boards and commission seek legal advice to address the question of enabling authorities regarding the ownership and operation of an insurance company.

The recommended option does not require the boards and commission to proceed with securing the enabling authorities under the *NPMA* to require producers to maintain insurance against disease losses.

Strategic Considerations – The recommended option should be considered to be a starting point in the boards’ and commission’s pursuit of transferring the risk of infected premises C&D. Continued work to examine and explore the Captive option provides greater strategic value over the longer term, however, legal and enabling authority issues would result in further delays in addressing the NAI discovery gap, who covers the extraordinary cost of IP C&D? The continued evolution of the BC Poultry Risk Mitigation Strategy may require other actions to be taken by the industry that would benefit from a BC captive insurance company. Adopting an enhanced surveillance system may not be accepted by the fronting insurer and necessitate change. As well, the potential need for industry to underwrite the market value cost of the Index Premise flock under a Rapid Response Plan would change the nature of the “insurance” and potentially affect the relationship with the fronting insurer. Having a BC captive insurance company owned by industry would keep the decision making within the control of the BC industry.

Accountability Considerations – In the event that the boards and commission support the recommendation to not pursue enabling authorities under the *NPMA* to require producers to maintain disease insurance, the boards and commission assume the responsibility and accountability to ensure funding is available to cover the extraordinary cost of IP C&D. This accountability is highlighted by the federal and provincial government’s stated position that these costs no longer qualify for funding assistance under the AgriRecovery Program.

Fairness Considerations – The benefits of a timely return to a system of orderly marketing vary between sectors, but clearly all producers realize the benefits. The use of levies provides the most reasonable approach to establishing and maintaining the Fund on a basis that shared by all sectors in an equitable manner.

Effectiveness Considerations – The use of the Fund is the most effective approach to covering the costs of infected premises C&D to enable the timely return to a system of orderly marketing. Having the boards and commission internalize the cost of the Fund as opposed to requiring producers to maintain insurance is also a more effective mechanism to enable the boards’ and commission’s ability to affect sound marketing policy.

Transparency Considerations – The group funded deductible and captive insurance options would have defined outcomes, governance protocols and operating procedures to which the administrator first and foremost and the boards and commission would be accountable to uphold.

In the event that the boards and commission decide to implement the Fund, financial transactions from the boards and commission to the Fund and vice versa will be documented and available for scrutiny.

Inclusiveness Considerations – The boards and commission have taken into consideration the impact on overall industry competitiveness in its assessment of the options and recommendations. The recommendation is consistent with not adversely affecting the competitiveness of the poultry industry in BC.