BC Poultry Infected Premises Cleaning and Disinfection Cost Recovery Fund

Joint Submission Appendices

British Columbia Broiler Hatching Egg Commission British Columbia Chicken Marketing Board British Columbia Egg Marketing Board British Columbia Turkey Marketing Board

Date

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Appendix A - History of NAI in BC 2004 - 2014

In February 2004, a case of Highly Pathogenic Notifiable Avian Influenza (HPNAI) was discovered on a broiler breeder farm on Matsqui Prairie in Abbotsford. This was the first commercial discovery of NAI in BC and at the time the industry did not expect that the discovery would change the nature of the poultry industry in BC forever as borne out by the subsequent discoveries in 2005, 2009 and 2014.

The 2004 response involved the federal, provincial and local governments and the entire poultry industry value chain in BC and at the national level. Over a period of two months, approximately 125 poultry operations made up of commercial and backyard flocks of chicken, turkeys, ducks, geese and other birds were depopulated within three kilometres of the 53 "Infected Premises" (commercial and non-commercial) to stop the spread of the virus. A total of 16.2 million birds were ordered destroyed.

The Economic Impacts on British Columbia Poultry Industry Due to the Avian Influenza Outbreak was prepared by Serecon Management Consulting Inc. in July 2004. The total economic impact of the 2004 HPNAI outbreak was \$393.2 million. The impact was felt throughout the poultry value chain and local economies. The direct impacts for the entire poultry industry were estimated at \$222.6 million. The direct impacts include the loss in output (farm gate receipts) with respect to the breeding and growing operations, plus the cost impacts in the hatching and processing activities as relevant in each industry sector.

The 2004 HPNAI outbreak provided many challenges to government and industry being the first major poultry disease with zoonotic (human health) implications. To minimize the risk of reinfection and spread the ensuing intensive cleaning and disinfecting (C&D) process for infected premises presented logistical and financial challenges to the industry. The challenges were addressed by the joint efforts and funding (\$3 million) of the processors and the boards and commission.

Two Low Pathogenicity NAI (LPNAI) discoveries were made in 2005 and 2009. The 2005 LPNAI involved a commercial duck farm and resulted in a significant number of regulated poultry farms falling within the Infected Premise zone with limited ability to restock until C&D of the infected premises were completed.

The 2009 LPNAI involved commercial turkey farms. The federal and provincial governments provided financial support for the extraordinary cost of C&D.

In 2014, 11 commercial premises were confirmed with HPNAI. The infected premises included broiler breeder, layer and turkey operations. There were 150 commercial poultry farms within 1 km of infected farms and 254 commercial farms within 10 km of the 11 infected commercial farms in the 2014 Highly Pathogenic Notifiable Avian Influenza outbreak. The federal and provincial governments provided financial support for the extraordinary cost of C&D.

Lessons learned assessments have been undertaken for all of the NAI outbreaks in BC with the intent of improving industry and governments' response to, management of and recovery from a future NAI discovery.

Roles and Responsibilities in Managing and Responding to a NAI Discovery

Through past experience gained from responding to and managing the 2004, 2005, 2009 and 2014 NAI discoveries, the roles and responsibilities of government and industry have evolved and are more fully understood and accepted by all parties. The Canadian Food Inspection Agency (the "CFIA"), under the authority of the *Health of Animals Act* (the "*HoA Act*") leads the management of the response in order to contain, control and eradicate the virus to eliminate the risk of reinfection and spread. CFIA assumes the cost of the control from confirmatory testing to establishing and maintaining quarantine zones to the ordered destruction of infected birds and the treatment of the infected material through the use of in-barn biological heat treatment (BHT) to destroy the virus. In the process CFIA pays market value compensation for birds ordered destroyed in addition to the costs of destroying the source of the virus.

Once CFIA has determined that the BHT process has reached critical temperatures for the desired duration, the C&D process can commence. The C&D process falls within the infected premise owner's management and financial responsibility. CFIA does not compensate for the cost of infected premise C&D but has final approval authority to minimize the risk of reinfection.

As part of the management of the response, the CFIA declares Infected Place (quarantine) on all premises with poultry within a 1 to 3 km radius (Infected Zone) of the index premises where NAI has been suspected, presumed or confirmed. Surveillance and movement controls are established for existing flocks within the Infected Zone. As well, the placement of new flocks is restricted until such time that the CFIA has lifted the Infected Place designation within the Infected Zone. The lifting of the Infected Place designation cannot occur until a minimum of 21 days has passed following the CFIA signing off the completion of the C&D of all infected premises. The ability of the boards and commission to exercise their authorities to return the industry to a system of orderly marketing is precluded until the CFIA has lifted the Infected Place designation (C&D process is declared completed by CFIA).

Based on experience gained from the 2004 HPNAI outbreak, the poultry industry in BC formalized an Emergency Response Plan (the "ERP") that mirrors the Canada-British Columbia Foreign Animal Disease Emergency Support Plan, including the Incident Command System (ICS). Industry members are fully trained in ICS and regularly conduct table top exercises to test the ERP. The BC Poultry Association (BCPA) has the lead responsibility for the ERP and the regulated poultry associations, boards and commission have assigned producers and staff to the key positions for the ICS. The ERP has been successfully implemented in the 2009 and 2014 NAI events. The ERP enabled the industry upon receiving notification of a NAI discovery to implement stop movement orders to minimize the risk of spread.

The BCPA in cooperation with the Ministry of Agriculture and CFIA led the development and implementation of the first mandatory poultry biosecurity program in Canada. The work in BC formed the basis of national biosecurity programs. BC remains the only province in Canada to make on-farm biosecurity requirements mandatory.

Following the 2014 HPNAI outbreak the BCPA continued to work with the BC Ministry of Agriculture to develop and implement a proactive surveillance program to provide early detection of the presence of NAI. A pilot program to test the system is under development.

The BCPA has facilitated the development of risk based solutions to support rapid recovery from a NAI discovery. The BCPA has supported the Mandatory Insurance Review. The BCPA through funding provided under the AAFC AgriRisk Initiative has directed work on key areas of the Review requiring external research and analysis.

Appendix B – Mandatory Avian Influenza Review Work Plan and Phase Reports

Need for Mandatory Insurance

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 registered 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 gave due consideration to the enabling authority and collectively agreed in January 2016 to initiate the Mandatory Notifiable Avian Influenza Insurance Review (the "Review"). The poultry boards and commission established a five-phase work plan to address the directions provided in the August 2014 BC FIRB order to examine a "more limited regulatory solution" in keeping with sound marketing policy to address the financial risks associated with a NAI discovery. The purpose of the Review was to conduct the requisite due diligence in accordance with the SAFETI 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 NAI discoveries in regulated poultry flocks.

The poultry boards and commission took into consideration direction provided by the BC Farm Industry Review Board (BC FIRB) in various letters on mandatory insurance in developing the five-phase work plan:

- August 14, 2014 Supervisory Decision Sound Marketing Policy and Board Authority Mandatory Poultry Disease Insurance
- March 3, 2015 Poultry Disease Insurance Supervisory Decision Follow-up
- May 12, 2015 Amendments to the *Natural Products Marketing (BC) Act*, Poultry Disease Insurance and August 14, 2014 Supervisory Decision
- September 12, 2015 Mandatory Disease Insurance Review and Assessment Draft Work Plan.
- October 13, 2015 Mandatory Disease Insurance Review and Assessment Next Steps.
- October 11, 2016 Mandatory Disease Insurance Review and Assessment Assessment Completion Schedule and Updates.
- February 5, 2018 Mandatory Notifiable Avian Influenza Insurance Review Completion of Phases

The substantive directions provided by BC FIRB include:

- "Use of an appropriate SAFETI process to determine what, if any, insurance may be required to help ensure orderly marketing."
- The need for mandatory insurance within the context of sound marketing policy.
 - How to effectively return the poultry industry to a system of orderly marketing?
- Consideration of the impact of mandatory insurance on the industries as a whole, including competitive pricing, foregone opportunities, the availability (or lack thereof) of government funding and related considerations.
- Decisions and rationale are publicly available in a timely manner.

Mandatory Notifiable Avian Influenza Insurance Review

The five-phase approach to the Review addressed the following key questions in accordance with BC FIRB directions:

- Why is a financial response necessary?
- What is the scope of financial response?
- Do the conditions of insurance exist?
- Do viable insurance delivery mechanisms exist?
- What mandatory insurance delivery mechanism is appropriate?

A comprehensive stakeholder engagement strategy was implemented:

- Utilization of the poultry boards and commission websites for posting information and reports on the Review and to receive industry stakeholder and public comment.
- Developing a joint interactive Mandatory Avian Influenza Insurance Review website <u>http://avianinsurancereview.com</u>
- Distributing information to and making presentations to the five poultry associations for input and comment throughout the process.
- Distributing information to and directing follow-up with the allied trades for input and comment.
- Compiling input and comments into a report with response where appropriate and posted to the poultry boards and commission websites for validation.

The Review Work Plan and phase reports are included in Appendix B1 - B&.

In summary, the Review confirmed that a financial response was necessary to respond to a NAI discovery, particularly to address the extraordinary cost of IP C&D. The Review determined that covering the extraordinary costs of IP C&D met the conditions of insurance and established that the ability of the boards and commission to put in place and maintain a fund to cover the extraordinary costs could be achieved within the existing levy structures for each board and therefore not affect the competitiveness of the BC poultry industry.

Given the findings of the Review, the boards and commission *determined that the need to request and implement mandatory insurance requirements were not necessary*, however, BC FIRB confirmed prior supervisory approval of a "more limited regulatory solution" was still required.

Board Decisions

The Review provided two sets of recommendations for the poultry boards consideration; the decision notes with recommendations are included in Appendix E. In June 2017, upon the completion of Phases 1 and 2, the Insurance Review Committee concluded that the boards and commission should recommend to BC FIRB their desire to use their powers to establish a mandatory Infected Premises C&D Cost Recovery Fund and undertake the following actions:

- 1. Notify industry associations and stakeholders of the proposed decision.
- 2. Post the proposed decision for industry and stakeholder review and comment for a period of 30 days.
- 3. Forward a copy of the draft decision to BC FIRB for review and comment.
- 4. Direct any and all comment received to the Insurance Review Committee for review and comment prior to making the final recommendation to the boards and commission
- 5. Final decision by all boards regarding the establishment of a mandatory Infected Premises C&D Cost Recovery Fund, by September 30, 2017.

Through June and July 2017, the four boards received the recommendations and independently agreed to proceed to the next Phases of the Review. Industry stakeholders were advised and referred to the joint avian insurance review website.

On October 18, 2017, the Insurance Review Committee Chair provided BC FIRB staff with an update on the Review, at which time, BC FIRB was advised that as a result of the work on Phases 3 to 5, the recommendation to notify BC FIRB of the boards' and commission's request to secure the prior supervisory approval to establish a mandatory Infected Premises C&D Cost Recovery Fund would not be forthcoming. BC FIRB staff were advised that it was felt that the use of existing levy proceeds and contingencies could accommodate the establishment and operation of the Fund.

In November, following the completion of Phases 3, 4 and 5 of the Review, the Insurance Review Committee tabled the following recommendations with the poultry boards and commission for consideration:

- 1. Accept the reports for all 5 Phases of the Review.
- 2. Not proceed to secure enabling authorities under the *NPMA* to require producers to maintain insurance against disease losses.
- 3. Based on sound marketing policy, commence action to establish an Infected Premise Cleaning and Disinfection Cost Recovery Fund to cover the extraordinary C&D of infected premises for future Notifiable Avian Influenza (NAI) disease discoveries using existing contingencies and levy structures.
- 4. Retain Agri-Saki Consulting Inc. to provide support to
 - a. Create the Poultry Disease Group Funded Deductible and related governance principles and operational mechanics.
 - b. Collaborate with the Province to support an AgriRisk Initiative Administrative Capacity Building for start-up administrative and initial capital funding.
 - c. Develop the questions for a legal opinion on whether or not the boards and commission have enabling authorities to own and operate an insurance company.
- 5. Notify industry associations and stakeholders of the decisions.
- 6. Forward a copy of the decisions to BC FIRB.
- 7. Post the decision for industry and stakeholder review and comment for a period of 30 days.
- 8. Direct any and all comment received to the Insurance Review Committee for review and comment.
- 9. Request BCPA to recommend a cost sharing formula for the Fund.
- 10. Commit to share any Infected Premises C&D costs for 2017/18 in accordance with an agreed upon cost share model.
- 11. Confirm the decision by all boards regarding the establishment of an Infected Premises C&D Cost Recovery Fund, by January 31, 2018 after giving due consideration to any and all comments received.

The boards per recommendation 9 requested the BCPA to bring forward recommendations for a cost-sharing formula for the Fund. The BCPA met throughout November 2017 in an attempt to reach consensus on a formula, but were unable to get unanimous support for equally sharing the initial capital fund and sharing the annual premium based on risk share as calculated in the November 2017 actuarial assessment by J.S. Cheng and Partners Inc. (JSCP).

Through November and December the Boards reviewed the reports and Insurance Review Committee's recommendations. On January 2, 2018, the board chairs (or designates on behalf of the chairs) and the Insurance Review Committee met to review the status of board decisions. At the meeting, the BCEMB identified that the Canadian Egg Industry Reciprocal Alliance (CEIRA) was nearing completion of their work on expanding the Salmonella enteritidis (SE) insurance coverage provided to egg producers to include NAI. The meeting resulted in consensus on the need to further revise the assumptions used by JSCP to assess the sector risk. As well, it was agreed that given the potential for NAI coverage for egg producers under CEIRA, the actuarial assessment should be completed with two sets of coverage for layers (\$2.50 per bird and \$0.75 per bird). Upon completion of the revised actuarial assessment, the board representatives agreed to recommend to their respective boards to accept and use the revised JSCP actuarial assessment sector risk values to:

- Apply to the annual premiums for the Fund; and
- Apply (retroactively if necessary) the sector shares to any collective costs incurred by the boards in response to an NAI discovery in 2018 to ensure timely IP C&D and industry recovery.

The Insurance Review Committee met with board chairs (or designated board member to act on behalf of the Chair) on April 4, 2018 to review the status of board consideration of the January recommendations. The meeting produced the following recommendations for each board to review and consider:

"the boards and commission agree to seek BC Farm Industry Review Board prior supervisory approval as set out in their August 14, 2014 Order to establish a BC Poultry Infected Premises Cleaning and Disinfecting Cost Recovery Fund to facilitate the prompt recovery and return to a system of orderly marketing.... The creation of the Fund requires board commitment to:

- Requesting BC FIRB prior supervisory approval to establish a collective Fund.
- Provide a \$250,000 contribution towards the initial capital of the Fund.
- Agree to share the annual costs to grow, sustain and manage the Fund.
- Establish a Fund Management Committee to finalize the operational details of the Fund, including, but not limited to:
 - Governance principles for managing the Fund;
 - The annual costs for the Fund;
 - Operational policies to guide the Fund; and
 - The risk transfer mechanism to insure the Fund.
- Appoint a member to the Fund Management Committee.

The Fund Management Committee met on July 12, 2018 and reviewed the summary of board decisions to date (Summary of Board Decisions through to July 2018 is included in Appendix F). The BCEMB stated that the CEIRA expansion of SE coverage to include NAI was going to be made available in the fall of 2018 and indicated that participation in the collective Fund would be redundant and result in a duplication of coverage. The Fund Management Committee considered options for transferring the risk and agreed to pursue and further examine working with CEIRA to provide excess loss coverage for hatching eggs, chicken and turkey.

Appendix B1 – 2016-01-27 Review Work Plan

(Refer to separate pdf file)

Appendix B2 – 2016-10-28 Review Work Plan Update

(Refer to separate pdf file)

<u> Appendix B3 – 2017-03-17 Phase 1 Report</u>

(Refer to separate pdf file)

<u> Appendix B4 – 2017-03-17 Phase 2 Report</u>

(Refer to separate pdf file)

<u> Appendix B5 – 2017-11-03 Phase 3 Report</u>

(Refer to separate pdf file)

Appendix B6 – 2017-11-03 Phase 4 Report

(Refer to separate pdf file)

Appendix B7 – 2017-11-03 Phase 5 Report

Appendix C – Legal Opinions

<u>Appendix C1 – March 11, 2011 Affleck Hira Burgoyne General Advice to BC Turkey Marketing</u> <u>Board – Use of Levy Proceeds to Pay Premiums to Self-Insurance</u>

(Refer to separate pdf file)

<u>Appendix C2 – February 14, 2013 Hunter Litigation Chambers letter to BC Chicken Marketing</u> <u>Board – Collection of grower levies by The British Columbia Turkey Marketing Board for the</u> <u>purchase of avian flu insurance</u>

Appendix D – Stakeholder Engagement and Feedback

Appendix D1 –2016-03-28 Letter from Five Fry Farms Ltd.

(Refer to separate pdf file)

Appendix D2 – 2017-06-06 Art Friesen Feedback to Website

(Refer to separate pdf file)

Appendix D3 – 2017-08-24 Email from Cowichan Valley Farms

(Refer to separate pdf file)

Appendix D4 – 2017-08-31 Letter from BC Chicken Growers Association

Appendix E – Review Decision Notes

Appendix E1 – 2017-06-13 Mandatory Insurance Steering Committee Decision Note

(Refer to separate pdf file)

Appendix E2 – 2017-11-08 Mandatory Insurance Steering Committee Decision Note

(Refer to separate pdf file)

<u>Appendix E3 –2017-12-05</u> Mandatory Insurance Steering Committee Briefing Note

(Refer to separate pdf file)

Appendix E4 – 2018-04-23 Insurance Review Committee Decisions Recommendations (Refer to separate pdf file)

Appendix F – Summary of Board Positions/Decision

Appendix F1 – 2018-01-02 Summary of Board Positions

(Refer to separate pdf file)

Appendix F2 – 2018-07-12 Summary of Board Decisions

Appendix G – Poultry Disease Insurance in Canada

Poultry disease insurance in Canada continues to evolve. Insurance plans started to emerge in response to losses in the hatching egg and table egg sectors due to Salmonella enteritidis (SE). In 2004, the Ontario Broiler Hatching Egg and Chick Commission made specific poultry disease insurance mandatory and the Poultry Insurance Exchange Reciprocal of Canada was established to develop and provide an insurance product. In 2007 a major outbreak of SE impacted a large portion of the Canadian egg industry with an estimated cost of \$4.5 million. The Egg Farmers of Canada responded with the launch of the Canadian Egg Industry Reciprocal Alliance (CEIRA) in 2011. In 2013 Manitoba egg producers launched an appeal challenging the requirement for licenced producers to purchase disease insurance through CEIRA. In January 2014, the Manitoba Farm Products Marketing Council ruled that egg producers in the province can purchase salmonella insurance from organizations other than CEIRA. The decision led to the development of a non-poultry insurance plan for disease insurance (A10K).

Canadian Egg Industry Reciprocal Alliance

In 2011, after nearly 10 years of research and development the egg industry implemented a SE insurance program for layer flocks through the CEIRA. CEIRA is a reciprocal, owned by its members, the provincial and territorial egg marketing agencies except Ontario, the Canadian Hatchery Federation and the Pullet Growers of Canada. CEIRA must be licenced in each of the provinces and territories it offers insurance. It currently has approximately 700 subscribers covering 16 million birds.

From the experience gained through SE insurance, CIERA has been working in collaboration with PIE and Équipe québécoise de contrôle des maladies avicoles (ÉQCMA) with funding provided by AAFC AgriRisk Initiatives (ARI) on a NAI insurance policy that would be available nationally to egg producers in combination with their current SE subscription. The NAI insurance product would cover market gap, business interruption and cleaning costs for layer producers in Canada. CEIRA has completed its process of restructuring/redefining their subscription agreements to broaden the scope of insurance provided, secured provincial financial regulatory approvals and is in the process of making it available to layer producers. CEIRA is also in the process of working with EQCMA to provide NAI coverage for the regulated poultry sector in Quebec.

The restructuring of its mandate and the ability to operate separate silos to provide coverage to different groups creates an opportunity for the regulated poultry industry in BC to work with CEIRA to transfer some of the risk of the extraordinary costs of infected premises C&D.

Poultry Insurance Exchange

PIE is a producer owned, not for profit licenced insurance provider in Ontario, Saskatchewan and Alberta. Its members include the Egg Farmers of Ontario, the Ontario Broiler Hatching Egg and Chick Commission, the Saskatchewan Hatching Egg Farmers and the Alberta Hatching Egg Commission. As a reciprocal, PIE must be registered as an insurance provider in each province that it operates.

On January 1, 2004, PIE commenced its insurance program to cover losses due to SE and Salmonella typhymurium Dt104 infection in broiler breeder flocks in Ontario. The insurance

requirement was made mandatory by the Ontario Broiler Hatching Egg and Chick Commission (OBHECC). While the requirement for the insurance was mandatory, the OBHECC regulation was silent on where or from whom the insurance could be purchased. With no other insurance companies providing Se coverage at the time, PIE became the insurer of record.

PIE has continued to respond to industry demand and in 2008 added two more diseases, Mycoplasma Synoviae (MS) and Mycoplasma Gallisepticum (MG) as insured perils. In 2011, PIE included SE coverage for Ontario Egg producers. PIE also provides SE coverage for Alberta and Saskatchewan hatching egg producers.

PIE, working in concert with the Ontario Feather Board Command Centre with funding through AAFC ARI is leading a project to extend current coverage to include Avian Influenza in response to subscribers' request. It has created an underwriting model template to develop a risk based insurance solution to provide coverage for business losses due to NAI; bridge the gap between CFIA compensation and defined economic losses of the producer, including infected premises clean up.

PIE was waiting for CFIA to finalize its compensation under the *HoA* for ordered flock destruction to be able to finalize coverage and premium costs. PIE is finalizing its regulatory requirements and is expected to implement its extended coverage in September 2018.

<u>A10K</u>

A10K is a Lloyds Coverholder in Canada, operating out of Toronto, Ontario. As a Lloyds coverholder, A10K is an insurance intermediary (broker) who has been developing new insurance products for the Canadian market. In 2013, responding to the growing demand for poultry disease insurance, A10K, working with the University of Manitoba and Crowe Livestock Insurance commenced development of a multi-disease insurance product for poultry in Canada. The 3D Poultry Disease Insurance Product was initially offered throughout Canada through HUB International. It is currently being offered through a number of insurance agents throughout Canada, such as Excalibur Insurance and Heartland Farm Mutual in Ontario and Valley Wide Insurance and Western General in BC. Coverage by sector is variable, in some cases, insurance is available for all four poultry sectors and in others it is limited to specific sectors, i.e. broilers or broilers and layers.

The 3D Poultry Disease Insurance provided coverage for

- physical loss for the shortfall in government compensation relative to the projected market value of a flock ordered depopulated;
- income loss for the projected profit from subsequent flocks that were prevented due to a quarantine order; and
- clean-up costs.

The insurance is available for four diseases, Avian Influenza; ILT; Newcastle Disease; and Salmonella Enteritidis.

Insurance policy wording for the 3D Poultry Disease Insurance is proprietary and not publicly available. Premiums are only available based on a request for quotation. Anecdotal comments indicate that some BC producers have requested quotes and that some have purchased the

insurance. It is not possible to confirm these comments as written requests to A10K for information on number of policies issued in BC have not been responded to.

In October 2013, representatives from A10K Inc. and Hub Insurance met with the BC poultry industry to present their multi-disease poultry insurance product for feedback and to determine BC industry interest. At the time, the product coverage was for Highly Pathogenic NAI (HPNAI) only, not Low Pathogenicity NAI (LPNAI) and coverage for C&D was limited to \$10,000. Coverage for both HPNAI and LPNAI was important to the BC industry, based on past experience and to support consideration of an enhanced NAI surveillance program which would yield more frequent LPNAI discoveries. A10K indicated at that time that it would not support providing insurance coverage for the entire BC poultry industry.

Mutual Fire Insurance of British Columbia

The Mutual Fire Insurance Company of British Columbia was formed by 44 farmers in the Fraser Valley in 1902. A mutual insurance company is owned by its customers, the member policy holders. In May 2018, Allan Cross and Harvey Sasaki met with a representative of Mutual Fire Insurance. The purpose of the discussion was to examine opportunities to secure insurance through Mutual Fire Insurance to cover the Fund. Information on the risks and exposure developed under the Review was provided to Mutual Fire Insurance for consideration. Mutual Fire Insurance completed its risk assessment and on June 14, 2018, indicated that the downside exposure risk exceeded the potential "profit" and were not prepared to underwrite the regulated poultry industry's IP C&D Fund.