



**BRITISH COLUMBIA
DAIRY COUNCIL**

September 23, 2014

Bob Ingratta
Chief Executive Officer
British Columbia Milk Marketing Board
32160 South Fraser Way
Abbotsford, BC V2T 1W5

Dear Bob:

Re: Proposed Amending Order for Code of Practice for the Care and Handling of Dairy Cattle

The Board of Directors of the British Columbia Dairy Council would like to thank you for the opportunity to discuss the proposed Amending Order for the Code of Practice for the Care and Handling of Dairy Cattle.

We appreciated the opportunity to hear the BC Milk Marketing Board's thinking behind the proposed Order and applaud the proposal to enforce compliance with the Code of Practice through the Order. We also appreciated the opportunity to recommend changes in the proposed language to better reflect the interests and concerns of dairy processors in the face of what we all agree is a critical and complex issue area.

Regrettably, the revised wording, as proposed, does not address the Dairy Council's concerns. While we understand BCMMB's requirement to provide a balance of interests within an enforceable regulatory framework, the proposed revisions do little to provide comfort that processors will not be left with the costs when the marketplace prohibits them from accepting milk that originates from a farm that has committed an animal welfare infraction. To the contrary, the proposed Order effectively and inappropriately transfers the financial risk from the offending farm to the non-offending processor(s).

Neither does the proposed wording provide assurances that processors will not be penalized in other circumstances where, for reasons that are beyond their control, they are forced to refuse to receive delivery of milk originating from a particular farm.

In our meeting the Dairy Council recommended specific wording changes that we had hoped would provide equal comfort for dairy processors and for BCMMB. For the reasons you have explained, this wording was not captured in the revisions proposed by BCMMB. Unfortunately

the alternate language proposed by BCMMB does not capture the intent of the Dairy Council's recommendations either.

We completely understand the importance of this matter and the urgency for BCMMB to act swiftly. However, in the absence of agreement on the wording respecting processor obligations, we must insist that Clauses 50(5) and 50(6) be removed from the proposed Amending Order and that further discussion take place to reach a suitable understanding. Otherwise, dairy processors will have no choice but to file a formal appeal.

Sincerely yours,

BRITISH COLUMBIA DAIRY COUNCIL

A handwritten signature in blue ink, appearing to read "Jeff Zonneveld", is written over the printed name. To the right of the signature, the word "For:" is written in blue ink.

Jeff Zonneveld
President

cc. BC Dairy Council Directors