

BC Vegetable Marketing Commission

Industry Consultation Report

September 25, 2025

Purpose

The purpose of this document is to share the recommendations that the BC Vegetable Marketing Commission (“the Commission”) received from a General Order Task Force (“the Task Force”) and discussed on September 3, 2025. The Commission broadly endorses the recommendations of the Task Force, although it wishes to receive more feedback from across the industry before moving forward with possible changes to the General Order.

This report includes a summary of findings and then details 27 recommendations regarding proposed changes to the Commission’s General Order.

Background

The Task Force was established by the Commission to provide input and recommendations on key policy issues with the General Order as part of the Commission’s General Order Modernization initiative. Specific areas to be reviewed included but were not limited to the following:

- Licensing (Types, Categories, Exemptions, Timing and Renewal)
- Food Safety & Biosecurity
- Northern Expansion
- Delivery Allocation
- Production Allocation
- Agency Reporting and Fees charged by Agencies
- Sanctions

The Task Force was composed of 4 Greenhouse Growers, 4 Storage Crop Growers, 4 Agency Representatives, and 3 BCVMC Commissioners, with one of the Commissioners being elected as Chair.

The Task Force convened 7 times, adopting a sequential approach to discussing and deliberating on the relevant policy concerns. Input and information were also sought outside of meetings from stakeholders and subject matter experts as required.

Summary of Recommendations

The BC Vegetable Marketing Commission's General Order Task Force has developed recommendations aimed at modernizing the Commission's General Order to enhance clarity, enforcement, and industry operations. These recommendations address licensing categories, renewal processes, food safety, agency operations, and market regulation to support orderly marketing and maximize grower returns. The recommendations can be summarized as follows:

- **Clarify licence categories:** Separate licences into "Marketing Licences" and "Producer Licences" for better role understanding in regulated marketing.
- **Revise licence types:** Maintain agency and producer/shipper licences with stricter definitions; eliminate Commission Salesperson licence; introduce new categories for organic and small-scale producers.
- **Decouple licensing from allocation requests:** Separate producer licensing from delivery and production allocation requests to streamline processes.
- **Standardize licence renewal terms and improve administration:** Set specific renewal periods for greenhouse, storage crop, processing crop, agency, wholesaler, and processor licences with automated, prepopulated renewal processes.
- **Expand enforcement authority:** Recommend exploring options for monetary penalties and other sanctions for non-compliance, including licence reinstatement and levy collection issues.
- **Changes to marketing thresholds:** Keep current exemptions for small greenhouse and storage crop producers; increase thresholds for northern expansion; consult industry about organic producer exemptions.
- **Implement baseline food safety and biosecurity requirements:** Introduce minimum standards for all licensees, with potential administrative penalties for non-compliance, leveraging Ministry of Agriculture support.
- **Preserve Manifest Sales Program:** Continue the program to manage off-spec product and prevent bootlegging, with improved reporting and protected customer lists.
- **Enhance transparency in delivery and production allocations:** Require agencies to document policies in annual business plans and maintain current production allocation methods, with consultation on significant changes.
- **Strengthen agency and producer regulations:** Require single agency representation for storage crop producers; allow limited multi-agency shipping for greenhouse growers under conditions; tighten agency application qualifications; maintain agency cooperation without excessive Commission involvement.

Recommendations

The Task Force reviewed several critical policy areas outlined in the Commission’s General Order and has formulated amendment recommendations for the Commission’s consideration and subsequent industry consultation. As well, certain areas reviewed were deemed to have adequate provisions within the General Order, although improvements in administration and greater enforcement were deemed necessary. The recommendations and areas for improvement are presented in the table of recommendations found on pages 4 through 11 of this report.

The recommendations are presented in a logical order that works through different aspects of the General Order that the Task Force explored. Many of the recommendations are relevant to all stakeholders, but we recognize that some of you will only be interested in certain recommendations. We therefore particularly draw your attention to the following highlighted recommendations that are specific to industry sector: (listed by the reference number found in the lefthand column of the table of recommendations).

Highlights of Sector-Specific Changes

For Storage Crop/Processing Producers:

- No. 6 – Sections 5,6: Storage Crop Licence Renewals
- No. 7 – Sections 5,6: Processing Crop Licence Renewals
- No. 12 – Licence Exemption Thresholds
- No. 16 – Section 1 (definition of “Delivery Allocation”),11, 35(1): Delivery Allocation

For Greenhouse Producers:

- No. 5: Sections 5,6: Greenhouse Licence Renewals
- No. 11 – Section 16(1)(a): Licence Exemptions and Thresholds
- No. 17 – Section 1(definition of “Production Allocation”),13,15: Production Allocation
- No. 18 – Section 13: Changes to Production Allocation (Industry consult process)
- No. 24 – Section 16(1)(c): Selling to Multiple Agencies

All these recommendations will be presented at our townhall meetings along with background and supporting rationale. You will then be given opportunity for discussion and to ask clarifying questions. Following the townhall meetings, you will also be invited to submit formal written feedback.

Thank you for taking the time to review these recommendations carefully and for participating in this consultation process.

No.	General Order Section / Discussion	Recommendation
1	Section 5: Licence Categories	Licences be separated and classified as “ Marketing Licences ” or “ Producer Licences ” to provide clarity and understanding of the role of the Licence in regulated marketing.
2	Section 5: Licence Types	<p>Marketing Licence provisions be amended as follows:</p> <ul style="list-style-type: none"> • Agency Licence – Remains the same. • Producer / Shipper Licence – Remains as an “exceptional licence” with stringent definitions and limits on where they are permitted based on geography, lack of agency representation, business plans, and market needs. • Packinghouse Licence – Included in the producer Licence where applicable and as a standalone Licence for entities not directly affiliated with a producer. • Wholesale Licence – Remains with a clearer definition of function and requirements to better address “bootlegging” and other concerns. • Commission Salesperson – Licence to be eliminated
3	Section 5 Licence Types	<p>Producer Licence provisions be amended as follows:</p> <ul style="list-style-type: none"> • Greenhouse Producer – Remains the same. • Storage Crop Producer – Remains the same. • Processing Crop Producer – Remains the same. • Strawberry Processing Crop Producer – eliminate and consolidate into Processing Crop Producer Licence • “Organic Producer” – New Licence category to identify these producers and apply food safety requirements. • “Small Scale Producer” – New Licence category to identify small producers who market through road-side stands and farmers markets and are below the exemption levels to market through agencies.

No.	General Order Section / Discussion	Recommendation
4	Sections 3,4,5, 6, 11,13: Licence Application and Renewal – Currently Licence application and allocation requests come in at the same time delaying the Licence application process.	It is recommended that the Commission decouple producer licensing from Deliver Allocation (DA) and Production Allocation (PA) Requests.
5	Sections 5,6: Greenhouse Licence Renewals	<p>Greenhouse Producer and Producer - Shipper licences would have a term of October 1st to September 30th.</p> <p>Administrative improvements required include starting the renewal process 60 days in advance of Licence expiration. Renewal information should be prepopulated as much as possible to facilitate updating contact and other information. Where practical this process should be automated or put online.</p> <p>Agencies need to be advised and updated on the status of producer licences.</p>
6	Sections 5,6: Storage Crop Licence Renewals	<p>Storage Crop Producer and Producer - Shipper licences would have a term of March 1st to February 28th.</p> <p>Administrative improvements required include starting the renewal process 60 days in advance of Licence expiration. Renewal information should be prepopulated as much as possible to facilitate updating contact and other information. Where practical this process should be automated or put online.</p> <p>Agencies need to be advised and updated on the status of producer licences.</p>

No.	General Order Section / Discussion	Recommendation
7	Sections 5,6: Processing Crop Licence Renewals	<p>Processing Crop Marketing and Producer licences would have a term of March 1st to February 28th.</p> <p>Administrative improvements required include starting the renewal process 60 days in advance of Licence expiration. Renewal information should be prepopulated as much as possible to facilitate updating contact and other information. Where practical this process should be automated or put online.</p> <p>Processors need to be advised and updated on the status of producer licences.</p>
8	Sections 5,6: Agencies Licence Renewals	<p>Agencies licences would have a term of May 1st to April 30th.</p> <p>Administrative improvements required include starting the renewal process 60 days in advance of Licence expiration. Renewal information should be prepopulated as much as possible to facilitate updating contact and other information. Where practical this process should be automated or put online.</p>
9	Sections 5,6: Wholesalers and Processors Licence Renewals	<p>Wholesalers and Processors licences would have a term of May 1st to April 30th.</p> <p>Administrative improvements required include starting the renewal process 60 days in advance of Licence expiration. Renewal information should be prepopulated as much as possible to facilitate updating contact and other information. Where practical this process should be automated or put online.</p> <p>Agencies need to be advised and updated on the status of producer licences.</p>

No.	General Order Section / Discussion	Recommendation
10	<p>Section 5: Licence Categories and Sanctions</p> <p>The Commission's inability to impose monetary penalties for issues beyond biosecurity resulted in the elimination of Licence categories which limits enforcement measures in cases of non-compliance.</p> <p>The ability to impose penalties also needs to apply to reinstating licences that have lapsed or expired. Agencies have in some instances withheld producer pool cheques until licence matters are resolved.</p>	<p>It is recommended that the Commission explore ways to expand its authority to administer monetary penalties and/or other punitive measures for licence matters, levy collection, and other issues of non-compliance, while maintaining flexibility outside the General Order, applying enforcement tools strategically (i.e. including licence conditions, suspensions, and revocations), and establishing clear guidelines to ensure consistent application.</p>
11	<p>Section 16(1)(a): Licence Exemptions and Thresholds</p> <p>Greenhouse Growers with less than 2,000 m² of production area are not required to market through an agency.</p>	<p>Greenhouse Growers – Maintain current exemption for marketing through agencies.</p> <p>Note: Some consideration was given to increasing the exemption threshold back up to 5,000 m².</p>
12	<p>Sections 1(definition of “Producer”), 16(1)(a)(c): Licence Exemptions and Thresholds</p> <p>Storage Crop Producers producing one ton or less of a regulated crop are not required to market through an agency.</p>	<p>Storage Crop Producers – Given that the expansion of the regulated area above the 53rd parallel (Northern BC) involves primarily storage crop producers, the following exemption thresholds for marketing through an agency are recommended:</p> <ul style="list-style-type: none"> • Northern BC – Increase the exemptions to 25 tons for potatoes and 10 tons combined for all other regulated vegetables. • Southern BC – Maintain the current storage crop exemptions. Note: Some consideration was given to extending the proposed exemptions above the 53rd parallel (below) to the entire province.
13	<p>Section 16(3): Licence Exemptions and Thresholds</p> <p>Organic Producers are currently exempt from regulation except for potatoes marketed through Fraserland Organics</p>	<p>Organic Producer Thresholds – It is recommended that before instituting exemptions and requirements for organic producers that a broader industry consultation take place to gather more data and information:</p> <ul style="list-style-type: none"> • Organic producer numbers, size, and crops grown • Organic distribution channels – Retail / Food Service / Farmers Markets / Etc.

No.	General Order Section / Discussion	Recommendation
14	<p>Sections 16(2)(b): Food Safety & Biosecurity</p> <p>Currently 10% of BC licensed growers do not have a food safety program in place. Adding food safety requirements to the General Order would create time, effort, and financial challenges for small producers.</p> <p>The BCVMC could either require a separate 'Biosecurity Addendum' in CanadaGAP audits or include specific biosecurity sections to be graded on their own as part of licensing. In either case, noncompliance with biosecurity could result in an administrative monetary penalty.</p>	<p>Given that food safety and biosecurity issues can impact the entire industry, it is recommended that the Commission include baseline food safety requirements for all licensees.</p> <p>Task Force members viewed Food Safety and biosecurity as a single program, so recommendation on Food safety also apply to Biosecurity.</p> <p>It was also recommended that the Commission utilize Ministry of Ag personnel and leverage grower groups in northern BC to assist in providing food safety certifications to growers.</p>
15	<p>Sections 1(definition of "Manifest Sale"), 16(5): Manifest Sales Program – Requirements were simplified, and limitations were removed in the last update of the General Order. The Manifest Sales Program was originally implemented to counter bootlegging and to provide an outlet for #2 or off-spec product.</p>	<p>Manifest Sales Program – It is recommended that this program be maintained in the General Order.</p> <p>It is further recommended that the Commission ensure these programs are consistent and workable with improved processes for maintaining an Agency "Protected Customer List" and monitoring these programs through regular reporting.</p>
16	<p>Sections 1(definition of "Delivery Allocation"), 11, 35(1): Delivery Allocation</p>	<p>Delivery Allocation – Given that there needs to be transparency in how delivery allocation is applied to ensure fairness and prevent conflict between growers, it is recommended that:</p> <ul style="list-style-type: none"> • Delivery allocation policies and procedures should be documented by the agency and included in the annual business plan to be approved by the Commission.

No.	General Order Section / Discussion	Recommendation
17	Section 1(definition of “Production Allocation”),13,15: Production Allocation	<p>Production Allocation (PA) – The consensus was to maintain the status quo of using m² of growing area for production allocation.</p> <p>It was further recommended that the Commission consider different methodologies to measure the growing for vertical farms. Note: Some consideration was given to using a different PA growing area calculation to account for whether greenhouses use lighting technology to grow year-round vs those that grow seasonally or use the same space for purposes other than production of regulated product during part of the year.</p>
18	Section 13: Changes to Production Allocation - The Task Force reviewed and discussed how changes (increases) to production allocation are managed and when industry consultation is required.	<p>Consultation Requirements – The recommendation is to continue to seek industry consultation on production allocation increases greater than 2,000 m².</p>
19	Section 12,14: Transfer of DA/PA	<p>The recommendation is to amend the General Order specifying that allocation can only be transferred by a producer who is in good standing otherwise the producer will be deemed to have exited the industry.</p> <p>It is further recommended that a definition for “Good Standing” be included in the General Order with an expectation of active engagement.</p>
20	Section 28(4)(5): Agency Business Plans – The Task Force discussed how agencies manage production volumes and growth ambitions. This is more of a potential issue with storage crops where producers typically grow more than their allocation to account for variables beyond their control or to take advantage of potential market opportunities.	<p>The Task Force understands the need for flexibility to manage DA at the agency level. However, to avoid potential market disruption, it is recommended that acreage plans and tonnage estimates be included in the agency’s annual business plan for approval and monitoring by the Commission.</p>

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21	<p>Section 33,35: Agency Reporting – The consensus was that Net Grower Returns is valuable information for growers and to help evaluate agency performance. It was noted that accuracy was more important than frequency.</p> <p>It was explained that with storage crops that the 60-day period makes sense because it is based on sales from the previous month and sales lag shipments. In other words, DA is based on shipments, and pool payments are based on actual sales.</p> <p>Agency representatives on the TF voiced a willingness to adjust reporting in a manner as directed by the Commission.</p>	<p>The recommendation is for the Commission to work towards more frequent reporting of net grower returns without sacrificing accuracy.</p> <p>Further some of the reporting requirements were viewed as administrative in nature and these requirements need to be specified or adjusted by the Commission.</p> <p>The reporting requirements need to be tailored for different agencies, specific crops and market situations, reflecting competitive considerations and the confidential nature of this information.</p>
22	<p>Sections 8,9: Agency Applications - The Task Force discussed whether the Commission should be more restrictive in permitting agency applications, for example putting a moratorium on agency applications until such time as and assessment of the market show that the industry can support additional agencies. It was suggested that we can achieve the same objective as a moratorium if we enhance requirements and qualifications.</p>	<p>The task force recommendation is to not restrict agency applications but tighten up the requirements and qualifications for agency applications (i.e. number and size of producers),and put more rigour into the evaluation process to ensure additional agencies will not disrupt orderly marketing.</p>
23	<p>Sections 16(1)(d),19(1) & (3),20(4),26(2): Transport Orders</p>	<p>The recommendation is to put the definition for Transport Orders back into the General Order clarifying the wording that agencies are accountable for the transport orders they issue.</p>

No.	General Order Section / Discussion	Recommendation
24	<p>Section 16(1)(c): Selling to Multiple Agencies - There were significant concerns expressed about allowing producers to be represented by more than one agency and the disruption to orderly marketing.</p> <p>It would be almost impossible for an agency to manage customer fulfillment levels if producers could ship to different agencies. The example of the blueberry industry was discussed, which was described as chaotic and disruptive.</p>	<p>The recommendation for storage crop producers is they be required to commit to a single agency.</p> <p>The task force recommends exploring the prospect of allowing greenhouse producers to ship to multiple agencies in a controlled manner with well-defined circumstances and parameters.</p> <p>Parameters suggested for potentially accommodating a producer to supply multiple agencies include differentiation by:</p> <ul style="list-style-type: none"> ➤ business organization ➤ crop type ➤ production facility
25	<p>Section 10(2)(g): Agency Producer Requirements - The Task Force also discussed whether Agencies need to have more than one grower and grower size. The consensus was it would be difficult for an agency to remain viable with only one grower, especially if it was a small grower.</p>	<p>The recommendation of the Task Force is that if circumstances reduced an agency to one grower, that before cancelling the Licence, the Commission request the agency to a “show-cause” hearing to present their plan to increase their producer base.</p>
26	<p>Section 27(10): Agency Cooperation – The Task Force discussed how agencies work together to manage market shortages and remove surpluses from the market. No concerns were expressed about a lack of specific expectation around cooperation.</p>	<p>The recommendation is to maintain current wording as it already demonstrates intent, and not have the Commission delve too deeply into commercial relationships between agencies.</p>
27	<p>Sections 37,38 – Levy Collection – There was discussion on making changes to how levies are collected (Storage Crop – monthly / Greenhouse – Annually)</p>	<p>The Task Force does not recommend any changes to the current levy collection process.</p> <p>Note: Some consideration is being given to adding interest charges to late payments of fees and levies.</p>

Key Considerations for Industry

The Commission urges stakeholders to review these possible amendments in their context with the following considerations:

- **Alignment with Commission Objectives:** Do these amendments support the Commission's mandate and objectives of maximizing grower returns and supporting the orderly marketing of regulated vegetables?
- **Stakeholder Impact:** How do these amendments impact stakeholder groups in the regulated vegetable production/marketing industry?

Conclusion

The Commission appreciates you taking this opportunity to contribute to the improvement of the General Order by reviewing these recommendations. We look forward to explaining them in more detail at the Townhall meetings and receiving your feedback.