

July 15, 2022

Mr. Phil Boyd, Executive Director Turkey Farmers of Canada 7145 West Credit Ave, Bldg 1, Suite 202 Mississauga, Ontario L5N 6J7

Re: 2022-23 Ontario Commercial Allocation

Dear Phil,

Ahead of the TFC 270th meeting in Halifax, TFO sent correspondence to TFC regarding Ontario's 2022-23 commercial allocation, which is attached with this letter for reference.

At this time, TFO is uncertain from the events of the 270th meeting if in fact this matter is considered as being resolved by the TFC Board of Directors. TFO certainly appreciates that the decision on the FPCC Complaint, which was still pending at the time of the 270th meeting, was on the minds of many directors and likely complicated discussions and potential decision-making on the 2022-23 allocation.

However, while extensive discussion was had in regards to TFO's correspondence, only one motion was voted on at the meeting, the scope of which was exclusively in regards to an increase in the national allocation from 143.0 to 146.0 Mkgs. No motions on provincial allocations were considered or voted on.

With the Complaint now concluded and the previous quota regulation submission not approved by FPCC, TFO is requesting that TFC give further consideration to and respond to Ontario's request for 2022-23.

Beyond the context provided in TFO's earlier correspondence, TFO wishes to elaborate on the approach it took in arriving at this allocation request. Essentially, TFO adopted a genuine methodology that it views as being consistent with TFC's previous interpretation and application of the Proclamation Criteria in 2019-20 (when the prior NCAP was in effect):

- TFO consulted with its processors regarding their FP requirements in a provincial context;
- Where processors indicated an increase in supply was needed, TFO undertook further validation
 with those processors to further understand the basis for their supply needs, as well as affirming
 that their requirements could not be supplied within the existing allocations (either within
 Ontario, or out of province)
- TFO then undertook further discussion on the aggregated supply request with Ontario processors

 TFO then aggregated the responses received, which formed the basis of the request submitted to the Agency

The underlying premise to TFO's approach is to build a allocation number anchored on individual processor consultations and which assumes that such processors are best able to assess their market needs. Relating this to TFC's prior interpretation of the Criteria, TFO endeavoured to follow a process similar to that which TFC viewed as being "the most practical means to take into account and apply the principle of CAP", recognizing there are certain aspects of the prior FP request process which TFO is unable to undertake unilaterally (e.g. TFO cannot undertake an Eastern agreement by itself).

TFO reiterates its offer from our June 20th correspondence for provide additional supporting details on the individual processor requests to TFC staff.

Next Steps

In consideration of the complaint decision from FPCC not approving the prior 2022/23 quota regulation submission, TFO seeks clarity from the Agency on two points:

- 1) Does TFC intend to proceed through 2022/23 without a quota regulation submission (for which precedent exists from the 2004/05 and 2005/06 control periods), or is there intention to attempt to submit a new 2022/23 quota regulation submission to FPCC for consideration?
- 2) If TFC does intend to attempt to establish a new 2022-23 quota regulation, can the Agency advise on what timelines that work will commence?

Finally, TFO requests an expedited reply from the Agency, in recognition that we are already in the third month of the 2022-23 control period and the window in which production decisions for the 2022-23 control period can be feasibly made is rapidly closing.

We again thank the TFC directors for their consideration of this request, and we appreciate a reply from the Agency at the earliest opportunity.

Respectfully submitted,

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Matt Steele

Vice Chair, TFO

CC: Brian Ricker-TFO, Duane Dietrich-TFO, Magda Wolanowska-OFPMC