



Henry Zantingh, Chair
Chicken Farmers of Ontario
P.O. Box 5035
3320 South Service Road
Burlington, Ontario L7R 3Y8

August 6th, 2015

Dear Mr. Zantingh and the Chicken Farmers of Ontario:

On behalf of the Sustain Ontario Alliance, I am writing to congratulate the Chicken Farmers of Ontario on the suite of new programs that were recently introduced. These new programs are a great step forward in addressing concerns that were raised by Sustain Ontario members and allies during consultations that were held earlier this year on "Allocating Future Growth."

We know that the CFO and Team Ontario have been working hard to launch these programs with enough time to allocate new quota for the 2016 year and we understand that there are tight timelines that need to be met.

Because this is a new program, however, there are many questions that are being raised by our members that we would like to help address. With your permission and in partnership with you, we would like to help clarify some aspects of the Family Food and Artisanal Chicken programs. We would love to share the below questions and your answers to them by publishing them in a blog post on our website.

We would also like to invite you to speak directly to our members in either of two ways:

- 1) Participate in a webinar hosted by Sustain Ontario some time during August to launch the new program and address questions and/or concerns.
- 2) Attend and/or sponsor our biennial conference, **Bring Food Home**, to be held in Sudbury, Ontario, this November 20-22nd. This conference is being hosted in partnership with Eat Local Sudbury.



The following questions are meant to help ease concerns of potential applicants and to clarify the stipulations of the program. We hope you will have a chance to respond by **August 12th, 2015.**

Sincerely,

A handwritten signature in black ink, appearing to read "Phil Groff".

Philip Groff
Director, Sustain Ontario
phil@sustainontario.ca

CC: Chris Horbász
Director, Policy and External Relations
Chris.Horbasz@ontariochicken.ca

Mike Philips
Senior Director, Business Development and Markets
mike.philp@ontariochicken.ca

Sustain Ontario is a province-wide cross-sectoral alliance that is working to create a food system that is healthy, ecological, equitable and financially viable. Comprised of over 75 member organizations, the Sustain Ontario alliance represents stakeholders from diverse sectors - farming, health, environment, business, public and non-profit. Sustain Ontario engages with its membership to take a collaborative approach to research, policy development, and action by addressing intersecting issues related to healthy food and local sustainable agriculture.

Questions

Family Food Program

1. Some farmers that raise 300 birds or less under the current exemption--and sell chicken through farm gate sales--are concerned that the exemption's new name and framework will no longer allow farm gate sales. **Can you confirm that the Family Food Program will still allow sales from the farm gate without requiring quota or an artisanal license?**
2. Under the Small Flock program, sales were limited to 300 per year. The minimum under the Artisanal license would demand at least a doubling of sales in one year. **Is it possible for Small Flock program farmers—with developed direct sales markets—to propose a more conservative market development schedule?**

Artisanal Chicken License Fees

3. According to the program's FAQ, CFO has established an Annual Production Licence Fee of 20¢ per quality chick placed. CFO and CFC fees and levies are also payable at 3.6¢ and 1.2¢ per chick respectively. These are payable when the license is issued. **Are these all “annual fees” to be paid at the time of renewal — or will the levies be paid at a different time? Can you also clarify if there will be any additional license fees charged to applicants?**

Sales and Marketing

4. The Artisanal Chicken Policy states “6.04 Chicken grown under this license is to be commercially marketed.” Many farmers already have an established direct marketing strategy that includes farm gate sales to individual consumers, and would like to expand into “commercially marketed” chicken using this strategy. **Please confirm that the Artisanal license does not exclude farm gate and/or other direct-to-consumer sales.**
5. In the application form, applicants are asked: “How will you market the artisanal chicken? Please provide details of partners, retail outlets or local markets if applicable.” **Are there any restrictions on the types of retail outlets and/or “select local markets” allowed within the “Artisanal Chicken Business**

Community”? Can you give some examples of marketing partners that do not fit with the program?

6. Policy 6.06 states that *A holder of an Artisanal Production Licence may only produce and market chicken as an Artisanal Chicken Farmer. Does this mean that quota holding CFO members will not be permitted to apply for an Artisanal Chicken License?*
7. Policy 8.02 states that *Artisanal chicken farmers will be active partners in growing the Artisanal Chicken Business Community by funding community development and program related costs. Is it possible to provide some clarification on this point? Can you give some examples of what this might mean for an artisanal chicken farmer?*

Practices and Safety

“Traditional” Methods

8. According to the Artisanal Chicken program FAQ, applicants must comply with the On-farm Food Safety Assurance and Animal Care programs of the CFO. They must submit to regular inspections from CFO and third party inspectors and in their application form, there is a requirement that photos of the “barn” are submitted. Many organic and artisanal producers wish to produce chicken with “traditional” practices such as ensuring that birds have access to or are consistently exposed to pasture. **Can you confirm that — as per organic standards — access to the outdoors and/or mobile facilities such as “chicken tractors” will be allowed within the the OFFSA and Animal Care programs? Will CFO work with Artisanal producers to develop an OFFSA protocol for ‘traditional methods’ of production?**
9. Please provide some details for Artisanal Community Business Partners: **Is a provincial or federal license adequate, or will processing partners require an artisanal license or quota? For those slaughter facilities with processing quota, will the Artisanal chicken count towards their quota?**

Defining Terms

“Partner”/“In Partnership”

10. In both 6.04 and 7.02, the policy refers to individuals applying for a licence “in partnership with another artisanal chicken business community partner(s).” Many farmers already have a large base of customers that they serve directly, and are concerned that the absence of a marketing / distribution partner may affect the success of their application. **Can you confirm that partnership with their “hatchery” and “slaughterhouse” will be sufficient for a successful application?**

Application and Selection

11. As has likely become apparent through the consultations that Team Ontario held earlier this year, past programs have raised concerns about the transparency and accountability of selection processes. Clear and transparent criteria for how new entrants and/or applicants to the Artisanal Chicken program are evaluated would be very helpful in mitigating these concerns. The Artisanal program policy calls for a “disciplined evaluation process”. **Does the CFO plan to provide a rationale to applicants who are rejected from the program? Will the 2016 application deadline be consistent with the September timeline?**
12. According to policy 8.07, Artisanal Chicken Farmers and the Artisanal Chicken Business Community are *required to conduct business digitally through CFO Connects*. **Will accommodations be made for members of the Amish or Mennonite communities?**

Compliance

13. Many interested applicants are concerned about the potential costs that are associated with compliance to this program. Will there be a guide for those applying to the new program that would explain the details of a complete farm inspection process? Are these inspections annual? What are the costs to the producer to comply?



We thank you for taking the time to respond to these questions. As with any new program, we understand that there will be details that need to be worked out as the program evolves. These questions are meant to help mitigate concerns for potential applicants and to help promote the merits of this new program.