

G R O U P E
AGÉCO



PULLET GROWERS OF CANADA STRATEGIC PLANNING

FINAL REPORT

PRESENTED TO
PULLET GROWERS OF CANADA



MAY 2024

EXECUTIVE SUMMARY

Pullet Growers of Canada (PGC) has undertaken a comprehensive reflection on the need for a national organization to represent pullet growers. To identify a strategic direction, PGC engaged in activities involving material input and participation from all provinces. The project's dual objectives were to support PGC in identifying a strategic direction based on its ability to achieve previous strategic plan objectives, and to improve and expand the representation of pullet growers, pullets, and the public interest at the national level.

The project began with a kick-off meeting in July 2023 in PEI, involving PGC board members and project teams from Groupe AGÉCO and Serecon. This meeting established collaboration opportunities and key contacts for consultations. From August to September 2023, interviews with provincial egg boards that were PGC members highlighted gaps in pullet representation and regulation across Canada. These consultations set the stage for further interviews with non-member provinces from October to December 2023, revealing general satisfaction with the Egg Farmers of Canada (EFC) regarding pullet issues, despite EFC's limited mandate over pullets. There was a preference for a pullet committee under EFC rather than a separate organization.

A regulatory scan conducted in December 2023 showed minimal updates since 2014, but still informing the project by highlighting regulatory gaps in pullet management. Based on these findings, the project team recommended in January 2024 that PGC dissolve in favour of proposing a pullet committee under EFC. A strategy was developed to survey pullet growers and form a working group to explore this option. From February to May 2024, a survey assessed grower reactions to the proposed committee and satisfaction with EFC's handling of pullet issues. Results indicated a preference for EFC representation and highlighted a need for better pullet grower representation.

In a joint working group proposal from March to May 2024, a presentation to EFC and provincial boards proposed forming a pullet committee. Three provinces supported the joint working group, six denied it, and one decision was pending. The final report in May 2024 summarized project activities and provided a final recommendation for PGC, supporting the formation of a pullet committee under EFC. Throughout the project, the team provided strategic advice based on evolving circumstances and stakeholder feedback.

The project concluded that there is a clear desire for improved pullet representation across Canada, but this representation is preferred to come from EFC rather than a separate organization like PGC.

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1. STRATEGIC PLANNING: RECOMMENDATIONS AND ROADMAP

1.1 SUMMARY OF FINDINGS

The objective of PGC's strategic planning effort was twofold:

- To support Pullet Growers of Canada (PGC) in identifying a strategic direction as an organization based on its ability to achieve the objectives set in its previous strategic plan.
- To support PGC in its objective of improving and expanding representation of pullet growers, pullets themselves, and the public interest at the national level.

This work was considered necessary owing to the reality that EFC does not have a mandate over pullets and provincial regulation for pullets varies significantly, representing a potential risk to the egg supply chain as a whole, since pullet quality ultimately influences layer performance.

In order to identify these gaps and the subsequent opportunities for PGC as an organization, provincial boards and producers themselves were engaged and a regulatory scan was completed. This work supported a clearer understanding of the landscape of pullet management in Canada, the needs and desires of growers, and the perceived position of PGC as an organization.

The findings from the project's activities reflect a clear desire for improved pullet representation across the country. Interviews (Appendices 2 and 3) and a survey (Appendices 6 and 8), in English and in French, was distributed to pullet growers in all ten provinces. The survey, completed by 88 pullet growers (integrated = 86%; independent = 14%) emphasized the need for pullet representation. For example, in response to the question: "How well do you think Egg Farmers of Canada (EFC) currently understands the unique challenges and needs of pullet growers?" only 22% felt EFC has a complete understanding of these topics (Figure 1).

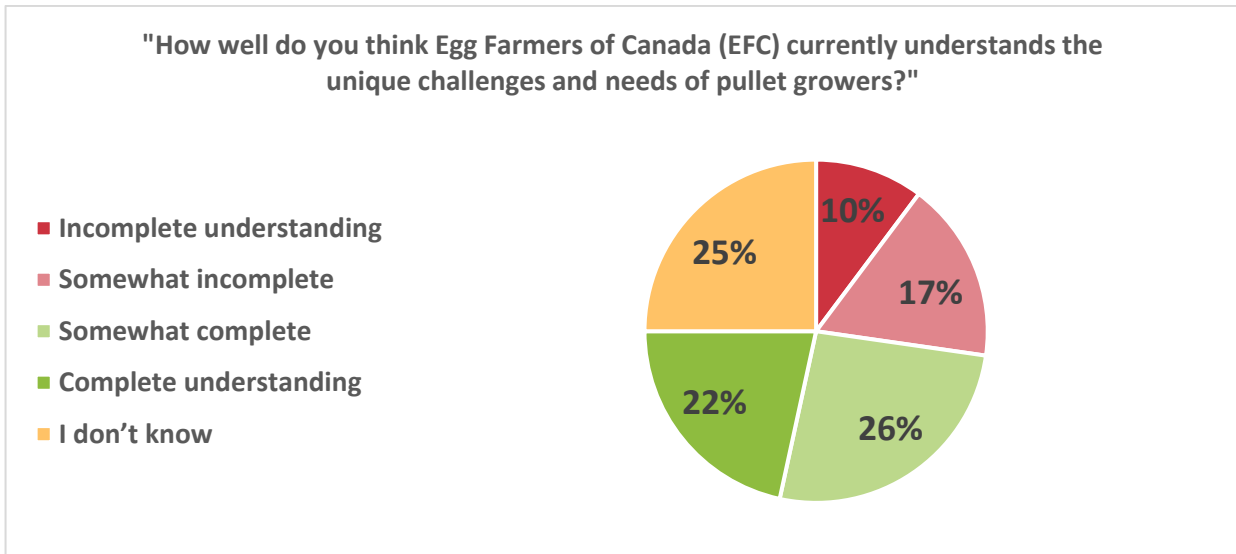


Figure 1

While a quarter of respondents were unsure, a combined 53% felt EFC had a limited understanding of pullet growers needs. This finding corresponds with the question on whether a pullet committee established by EFC would address these concerns, where 50% of participants agreed with such a proposition (Figure 2).

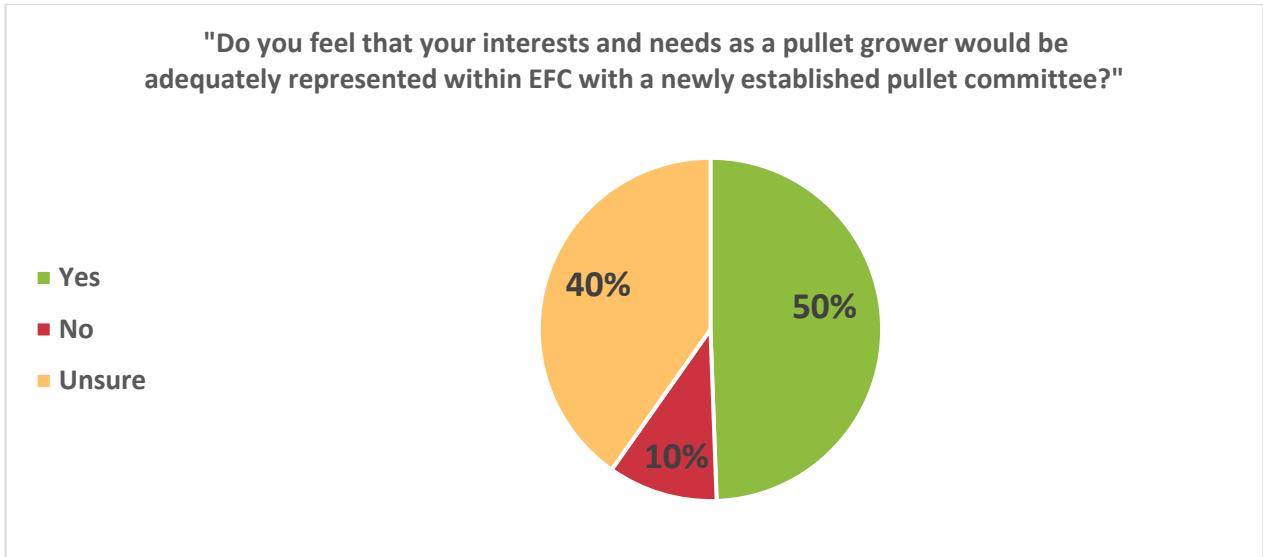


Figure 2

However, there is little appetite for that representation to come from a second organization, i.e., from PGC, with almost 60% of participants feeling positively about the dissolution of PGC and its integration with EFC (i.e., the integration of its mandate over pullet representation) (Figure 3).

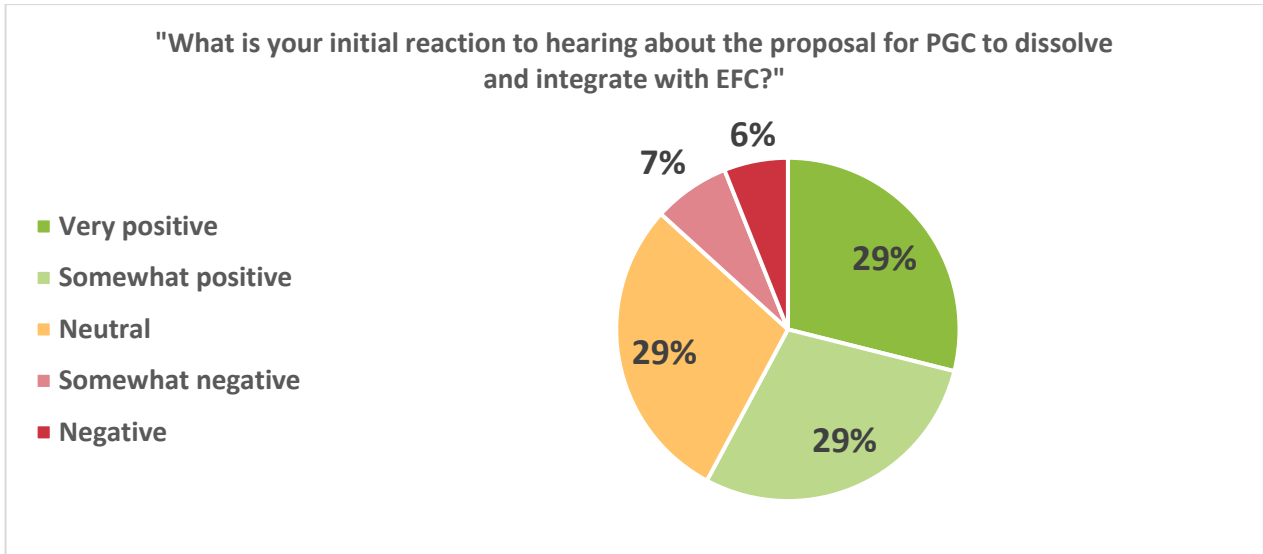


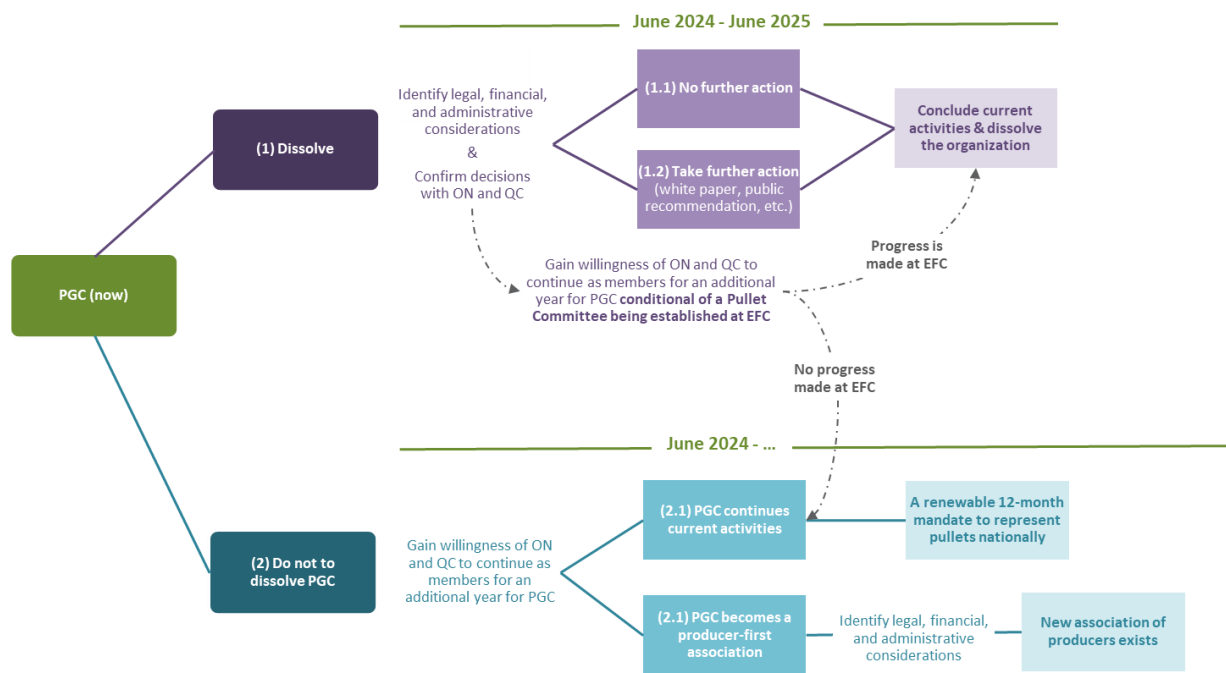
Figure 3

The desire for a single organization to be responsible for receiving, representing, and otherwise addressing pullet grower and related concerns reflects the perception expressed by stakeholders that pullets are a part of the egg supply chain and not a separate supply chain unto themselves; put another way, pullets are understood as an input for egg production. The result of this reality is that most pullet growers are also egg producers, growing for themselves or for other egg producers as "integrated producers", and in this way are already represented by EFC. While independent pullet growers lack representation at the national level, it was felt by stakeholders that representation of independents is best left to the provincial egg boards.

PGC has been prominent at the national level in its efforts to advocate for pullet growers and for the public interest. Its activities include cost of growing surveys and representation of pullet growers on key files, such as the redevelopment of the animal care program. However, the presence of a second organization at the national level has led some stakeholders to describe a sense of conflict or administrative inefficiency, given the largely integrated nature of the egg supply chain. In view of these findings, recommendations are presented below.

1.2 RECOMMENDATIONS

We recommend PGC pursue one of two scenarios (Figure 4).



To proceed according to the timelines of the ON and QC provincial board meetings, and according to key administrative dates, either the end of current calendar year (DEC 2024, 6 months) or the end of PGC’s fiscal year (JUN 2025, 12 months)

Figure 4

Figure 4 presents a decision pathway for PGC from June 2024 until June 2025, outlining potential actions for the organization. The decision-making process is split into several steps, starting with an immediate decision to either dissolve PGC or continue its activities, with subsequent steps based on the progress and decisions made between June 2024 and June 2025.

PATHWAY 1: DISSOLVE PGC

- 1. Initial decision: The first decision point, labeled involves whether to dissolve PGC. If the decision is to dissolve, the next steps focus on identifying legal, financial, and administrative considerations and confirming decisions with the Ontario (ON) and Quebec (QC) provincial boards.
- 2. No further action (1.1): If no further action is taken from June 2024 to June 2025, the organization proceeds to conclude current activities and formally dissolves.
- 3. Take further action (1.2): If further action is taken, such as preparing a white paper, making public recommendations, or other activities, the goal is to gain the willingness of ON and QC to continue as members for an additional year. This continuation is conditional on the establishment of a Pullet Committee at EFC. Depending on progress at EFC, the organization might either dissolve after June 2025 or take further steps based on new decisions.

PATHWAY 2: DO NOT DISSOLVE PGC

- 1. Initial decision: If the decision is not to dissolve PGC, the next step is to gain the willingness of ON and QC to continue as members for an additional year.
- 2. PGC continues current activities (2.1): If ON and QC agree to continue, PGC can either continue its current activities or become a producer-first association if the provinces decline, subsequently identifying relevant legal, financial, and administrative considerations related to the restructuring.
- 3. A renewable 12-month mandate (2.2): If PGC continues its current activities, it aims to obtain a renewable 12-month mandate to represent pullets. This ensures the organization's operations and representation can continue on an annual basis, provided ongoing support from the provincial boards.

TIMELINE AND DECISION POINTS

The pathways adhere to specific timelines aligned with the ON and QC provincial board meetings. Key administrative dates for decisions include the end of the current calendar year (December 2024, six months) or the end of PGC's fiscal year (June 2025, twelve months). These timelines are crucial for ensuring the appropriate steps are taken within the designated periods to either dissolve or continue the organization's activities effectively.

2. SUMMARY OF ACTIVITIES

In support of the PGC's strategic planning, Groupe AGÉCO and Serecon completed the following:

Dates	Activities	Deliverables
JUL 2023	Kick-off meeting in PEI with PGC board	<i>Presentation (PPT)</i>
AUG-SEP 2023	Interviews with current PGC board members	<i>Interview guide (Word) Summary report (Word)</i>
OCT-DEC 2023	Interviews with provinces which are not active members of PGC	<i>Summary report (Word) Interview guide (Word)</i>
DEC 2023	Regulatory scan of provincial pullet representation	<i>Summary report (Word)</i>
JAN 2024	Strategic recommendation	<i>Presentation (PPT)</i>
FEB to MAY 2024	Pullet grower survey	<i>Survey draft EN (Word) Survey draft FR (Word) Live survey EN (Online) Live survey FR (Online) Weekly updates (email) Survey results (PPT)</i>
MAR to MAY 2024	Joint working committee group	<i>Attendance and presentation at an EFC meeting in Ottawa in support of PGC (PPT)</i> <i>Review of PGC letter to provincial boards and on-going strategic advice</i>
MAY 2024	Survey results	<i>Presentation (PPT)</i>
MAY 2024	Final report	<i>Final report (Word)</i>
JUL 2023 to MAY 2024	On-going strategic advice and support as needed	<i>Calls (Phone, Zoom) Working sessions (PPT)</i>

2.1 JULY 2023: KICK-OFF MEETING

In July 2023, a kick-off meeting was held at the PGC board meeting in PEI. Groupe AGÉCO and Serecon (the project team) attended in person to animate the discussion, respond to questions, and overall describe how the project would likely unfold in terms of its planned activities. PGC identified opportunities for collaboration and key contacts for consultations Kick-off meeting, and provided context for the need for the project.

2.2 AUGUST TO SEPTEMBER 2023: INTERVIEWS WITH MEMBER PROVINCES

To set a foundational understanding of PGC's perceived value and needs, the project team interviewed representatives from provincial egg boards which maintained membership with PGC at that time. Findings from these consultations indicated that there may be gaps across the country in terms of how pullet growers are represented and how pullet production is regulated, including how on-farm programs (Start Clean-Stay Clean and the Animal Care Code) are audited.

Interviews provided the context needed to inform the next round of interviews with representatives from provincial boards who did not maintain membership with PGC at that time.

2.3 OCTOBER TO DECEMBER 2023: INTERVIEWS WITH NON-MEMBER PROVINCES

Interviews were conducted by the project team with representatives from provincial egg boards who did not maintain membership with PGC. The purpose of these interviews was to ascertain the rationale behind not maintaining membership with PGC, which provided indirect insight into the perceived overall value of PGC in general. Participants were also asked about their satisfaction with current EFC involvement in and understanding of pullet production concerns. Finally, several scenarios for the future of PGC as an organization were presented to participants in order to provide a strategic direction for the organization.

The results of the interviews indicated that, in general, most provinces are satisfied with EFC's involvement of pullet growers' input. While it was acknowledged by most participants that EFC does not necessarily have a mandate over pullets, their consideration of pullet issues and of growers' concerns is adequate. A key result of these interviews was that the majority of provincial board representatives favoured a scenario in which PGC were dissolved and a pullet committee under EFC were established.

2.4 DECEMBER 2023: REGULATORY SCAN

A scan of publicly available national, provincial, provincial board, and EFC regulations was completed to ascertain whether any major regulatory changes had occurred since the previous regulatory scan was completed in 2014, in support of PGC's submission to the Farm Products Council of Canada to establish a pullet marketing agency. The regulatory scan found that few material updates to the regulation of pullets had been made. The regulatory scan was, however, instrumental in supporting the project team's understanding of the gaps in pullet management from province to province, and informed the project by describing the national landscape of pullet regulation.

2.5 JANUARY 2024: STRATEGIC RECOMMENDATION

The findings from all previous activities indicated that a separate pullet organization, i.e., PGC, was not perceived as desirable by the majority of key stakeholders. In keeping with the overall objective of this project, i.e., to identify the best mode of representation for pullet growers, pullets themselves, and the public interest, and to identify a next step for PGC as an organization, the project team recommended that PGC pursue the option of proposing a pullet committee be established by EFC.

To support this direction, the project team collaborated with PGC to develop a strategy which involved surveying integrated and independent pullet growers across the country, and soliciting provincial boards to join a working group that would identify the merits of such a pullet committee and, more generally, the best mode of representation for pullet growers in general.

2.6 FEBRUARY TO MAY 2024: PRODUCER SURVEY

The producer survey was drafted for PGC by the project team. The survey contained a combination of qualitative (open-ended) and quantitative (closed) questions. The questions in the survey attempted to assess pullet grower reactions to the proposition of a pullet committee and current satisfaction with EFC's understanding of pullet growing issues. The survey was anonymous, but data related to location, and production size, and production type were collected. Survey respondents were invited to voluntarily share emails to subscribe to PGC's newsletter.

The survey results reflected those of the interviews: there is simultaneously a desire for expanded pullet representation, but for that representation to come from EFC rather than from a second organization, e.g., EFC. This finding reflects the distribution of producer types across the country, where the majority of pullet growers are also egg producers, and therefore already represented by EFC. While the results uphold the desire for administrative efficiency in the form of a single organization, they also present a clear need for greater representation of pullet growers' concerns.

2.7 MARCH TO MAY 2024: JOINT WORKING GROUP PROPOSAL

To support PGC in executing on the recommendation to propose the formation of an EFC pullet committee, the project team and PGC prepared a presentation that was made given collaboratively at an EFC meeting in Ottawa. The purpose of the presentation was to share with provincial boards the results of PGC's work over previous months and the resulting recommendation of a pullet committee in place of a separate organization (PGC), and the desire for expanded pullet representation in some form. The individuals in attendance were, for the most part, the same individuals who had been interviewed previously, many of whom actively supported the scenario of a pullet committee. At the meeting, the broad majority of those in attendance provided verbal support of the proposed committee and agreed both to distribute the producer survey and to share the proposal of forming a joint working group with their boards at a later date. EFC itself shared some comments, indicating that it would consider such a proposal if the ask came from the provinces and from producers themselves, and would look with interest for the results of the survey.

Following the Ottawa meeting, the project team provided on-going advice and support to PGC as the replies of provincial boards were returned. As of this writing, three provinces agreed to support the joint working group, six denied the request, and one is still pending. The project team attended a PGC board meeting to discuss these results and share a preview of the results from the producer survey.

2.8 MAY 2024: FINAL REPORT

Following the decisions of the provinces and the producer survey results, a final report (the present document) was prepared which summarized the activities of the project, including all deliverables attached as an appendix to the report. The final report synthesized the findings of all activities in the form of a final recommendation for PGC.

2.9 MAY 2024: SURVEY RESULTS

Preliminary survey results were presented to the PGC board and to member provinces. The findings were presented in order to inform PGC's next steps and decisions as an organization and to help the organization understand the different pathways available to take and what contingencies may influence or result from each decision.

2.10 JULY 2023 TO MAY 2024: ON-GOING STRATEGIC ADVICE AND SUPPORT AS NEEDED

Throughout the project, the project team was available to provide advice and support to PGC as issues arose and circumstances evolved. The project team provided recommendations based on changes in personnel, resources, needs, and received feedback from other stakeholders in view of the project's objective to expand or otherwise improve pullet grower representation at the national level.

APPENDIX 1: JULY 2023: KICK-OFF MEETING



PULLET GROWERS OF CANADA STRATEGIC PLANNING WORKING SESSION



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Summer Meeting
12 July 2023

G R O U P E
AGÉCO

Agenda

Summer Meeting

90 min

12 July 2023

- 1 Introductions
- 5 minutes
- 2 Pullet Growers of Canada: Project Background
- 15 minutes
- 3 AGÉCO + Serecon: Proposal Presentation
- 15 min
- 4 Current and Potential Value Creation for the Pullet Growers of Canada
- 40 min
- 5 Step 1: Subscriber Survey Overview
- 10 min
- 6 Concluding Remarks and Next Steps
- 5 min

MEETING'S OBJECTIVES

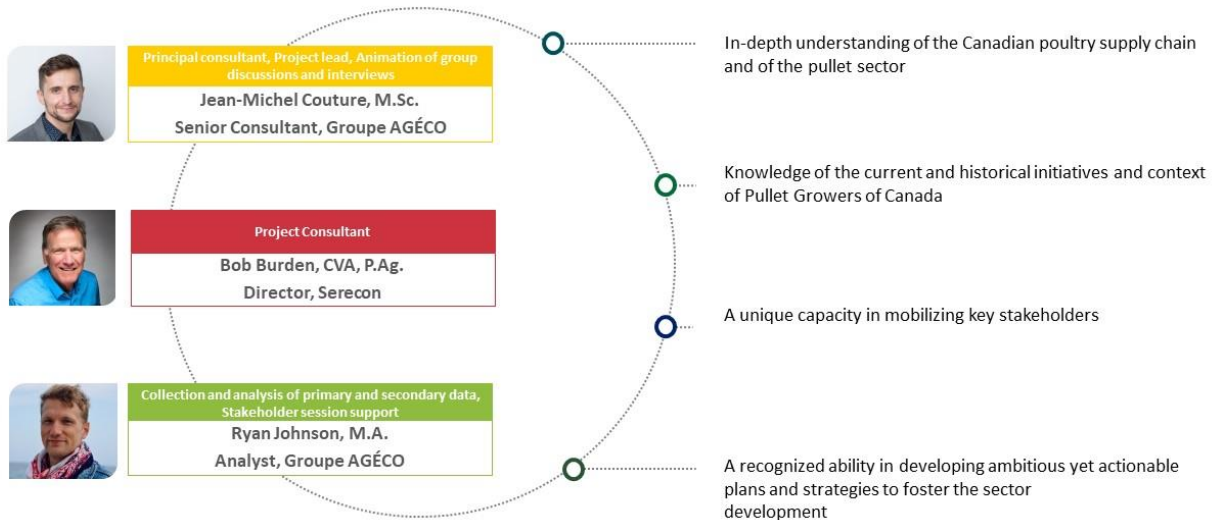
- Confirm our understanding of the organization's current status, and challenges
- Present and confirm our proposed approach
- Understand current value created by PGC and collaboratively explore potential value creation opportunities
- Present preliminary survey overview for discussion
- Consolidate and share next steps

3

5 min

ROUNDTABLE OF INTRODUCTIONS

ABOUT THE TEAM



5

15 min

PULLET GROWERS OF CANADA: PROJECT BACKGROUND

PULLET GROWERS OF CANADA: PROJECT BACKGROUND

- Recent history
 - Difficulty in achieving BP objectives
 - Loss of some members
 - Unwavering support from current members
 - Relevance called into question
 - Loss of contact with EFC committees (PMC and ACP redevelopment team)
- Current issues
 - Code of practice implementation (ACP, SCSC,...)
 - National representation (no agency status,...)
 - Blurred authority over pullets
- New direction in 2023
 - New leadership
 - Increased contacts with stakeholders (e.g. EFC, FPCC, federal ag. minister, NFACC)
 - COG study

VISION

PGC strives to solidify its reputation and enhance its recognition as the source of support and expertise for all problems and processes related to pullet production. This includes but is not limited to the Animal Care Policy for Pullets and the national Code of Practice, as well as ensuring the financial stability and viability of the industry by helping achieve a fair price to the grower.

Mission

We defend the interests of Canadian pullet growers, working to ensure their success as critical partners in the Canadian egg industry.



7

15 min

PROPOSAL PRESENTATION

PROPOSAL PRESENTATION

OBJECTIVE

“To support Pullet Growers of Canada in clearly defining its value and strategic positioning as a representative organization in the egg value chain.

“To answer the question: ‘Is there a role for PGC in this sector?’ and, subsequently, to provide a corresponding action plan.”

- **Understand** stakeholders’ perception of PGC’s value
- **Advise and collaborate** with PGC and its partners on a future direction
- **Strategize** for the future of the organization by providing a business plan which responds to the collected feedback

What should be the outcome of this project?

What should this project avoid doing?

What could help or hinder this objective?

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PROPOSAL PRESENTATION

APPROACH

Stage 1: Stakeholder Consultation

- Identify the key risks and benefits of PGC according to its stakeholders
- Inform the directions available for PGC to take as an organization

Outputs of Stage 1

- Survey design and interview guide
 - (Word document, English)
- Consultation results and recommendations
 - (Word document, English)

Related Activities

- 1.1. Survey
- 1.2. Stakeholder Interviews

- Consultation results and recommendations presentation
 - (PowerPoint, English)

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PROPOSAL PRESENTATION

APPROACH

Stage 2: Strategic Plan Development

- Provide options for PGC’s organizational position, purpose, and future direction
- Provide a plan for the 2024–2028 period and an implementation plan for the first year

Related Activities

- 2.1. Workshop with PGC and partners
- 2.2. Development of a business plan and an action plan for the first year of implementation

Outputs of Stage 2

- 2024–2028 Business plan
 - Word document (English, French)
- 2024 Action plan
 - Word document (English, French)

What key considerations should we keep in mind at each stage of the project?

What opportunities or threats could help or hinder the success of the project?

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PROPOSAL PRESENTATION

TIMELINE

- A project to take place between July 2023 and March 2024

Key milestones will include the following:

- | | | |
|---|-------------------|--------------------------------------|
| • Kick-off meeting in PEI: | July 12, 2023 | |
| • Survey designed and distributed: | July 21, 2023 | |
| • Survey closed: | August 25, 2023 | |
| • Interview guide developed, invitations sent: | September 1, 2023 | |
| • Interviews completed: | October 6, 2023 | |
| • Consultation results prepared, validated: | October 20, 2023 | |
| • Consultation results presented: | November 2023 | |
| • Workshop with PGC and partners: | November 2023 | Decisive milestone |
| • Business plan | | |
| – Draft 1: | December 2023 | A first draft by the end of the year |
| – Review 1: | December 2023 | |
| – Preliminary draft: | January 2024 | |
| – Review 2: | February 2024 | |
| – Final draft: | February 2024 | |
| – Final review: | March 2024 | |

Are there key milestones to account for during this period (e.g., AGMs, board meetings)?

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PROPOSAL PRESENTATION

GOVERNANCE

Project Team

- Project manager:
 - Jean-Michel Couture (**Groupe AGÉCO**)
- Subject matter expert:
 - Bob Burden (**Serecon**)
- Analysis and materials preparation:
 - Ryan Johnson (**Groupe AGÉCO**)

Pullet Growers of Canada

- Project manager:
 - Renaud Sanscartier
- *Internal committees?*
- *Working groups?*

Check-In Meetings

- *Frequency?*

Who is responsible for signing-off on the decisions / deliverables?

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40 min

CURRENT AND POTENTIAL VALUE CREATION FOR THE PULLET GROWERS OF CANADA

ROUNDTABLE DISCUSSION

CONSIDERATION 1 – THE BASELINE

- As of now, what are PGC’s main activities that bring the most value to the industry (*i.e., what are the key strengths of the PGC as representatives of pullet growers*)?
 - How so?
 - Who is benefitting from them?

- Could the value of these activities be increased?
 - If so, how?
 - If not, what are the internal / external barriers or limitations?

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ROUNDTABLE DISCUSSION

CONSIDERATION 2 – PRODUCERS’ AND MEMBERS’ NEEDS AND EXPECTATIONS

- To what extent does PGC’s current value creation fall short with respect to non-members’ expectations?
 - What would it take to bring members back?

- What are the expectations of pullet growers from the PGC?
 - Can the organization better align its activities and initiatives with these expectations?

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ROUNDTABLE DISCUSSION

CONSIDERATION 3 – FUTURE SCENARIOS

- What would be the consequences of closing the PGC?
 - Who would be impacted the most? The least? How so?
 - How would the gap be filled?
- What if PGC were to become a “committee” of the Egg Farmers of Canada?
- What are the potential opportunities for the organization to expand its influence and create greater value for its members and pullet growers?

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10 min

SUBSCRIBER SURVEY OVERVIEW

SUBSCRIBER SURVEY OVERVIEW

- **Purpose and Participants**
- Questions

Purpose: To understand, at a high level, the perceived role of PGC and the value it brings to meeting the needs of Canadian pullet growers and inform the design of interviews.

Participants: Newsletter subscribers

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SUBSCRIBER SURVEY OVERVIEW

- Purpose
- **Questions**

- What are the key strengths of the PGC as representatives of pullet growers?
 - How can these strengths be leveraged to enhance their value?
- How effectively does PGC communicate and advocate for the interests of pullet growers within the egg supply chain?
 - Are there gaps or missed opportunities in these activities?
- As of now, what are the main activities that bring the most value to the industry?
 - How so?
 - Who is benefitting from them?
- Others?

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NEXT STEPS

- Begin survey development and deploy
- Analyze results and build interview guide
- Prepare and distribute minutes from today's meeting
- Set next meeting date



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THANK YOU

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APPENDIX 2: AUGUST TO SEPTEMBER 2023: INTERVIEWS WITH MEMBER PROVINCES



MEMBER INTERVIEWS: SUMMARY NOTES

PRESENTED TO
PULLET GROWERS OF CANADA



PROJECT TEAM

AGÉCO

Jean-Michel Couture, Principal Consultant, Project Lead

Ryan Johnson, Analyst

Serecon

Bob Burden, Project Consultant

3. INTERVIEW SUMMARIES

3.1 MEMBER INTERVIEWS

Interviews were conducted with members of Pullet Growers of Canada, namely, the egg boards of Quebec, New Brunswick, and Ontario. The purpose of these interviews was to test the hypothesis that there is a gap in support for pullet growers regarding program implementation and compliance for Start Clean-Stay Clean and the Animal Care Program, and the additional hypothesis that Pullet Growers of Canada could play a role in filling this gap.

The interviewees expressed support for the Pullet Growers of Canada and for national representation of pullets and pullet growers in general. It was felt that the organization could play a role in standardizing, managing, and supporting pullet management and program implementation, but integrated growers tend to be less supportive than independent growers who would benefit from this representation to a greater extent.

The interviews revealed that there is a need to further explore the status quo for pullet management and oversight, and to define in what capacity Pullet Growers of Canada can intervene as a representative authority for both pullet growers and for the public interest. There remains some uncertainty around regional differences in how pullet growers are represented and monitored, and what Egg Farmers of Canada considers to be practical and appropriate for the same.

In brief, the takeaways from the member interviews are as follows:

- Gaps exist in authority over and guidance for pullet management
- There are regional differences in program implementation and compliance for pullet growers
- There are regional differences in the authority of provincial egg boards
- Pullet growers could benefit from greater support or representation on key management concerns
- Representation and standardisation at the national level would be a benefit to mitigating risks, ensure fair pricing, and advocating for a healthier industry, particularly for independent growers who have no market guarantees

Our recommendations for next steps would be to complete the interviews with non-members, beginning with Egg Farmers of Canada to better understand their perspective on these topics to better understand the perceived and actual role Pullet Growers of Canada could take on.

3.1.1 FÉDÉRATION DES PRODUCTEURS D'OEUF DU QUÉBEC

The recent PSA program aims to align with the code, but faces evaluation challenges. Achieving uniformity and jurisdiction for the program implementation remains a concern, especially for independent growers. There is little differentiation in program compliance for independent and integrated pullet growers, emphasizing the need for clarity. While closed-loop systems work well for most growers, independent growers' smaller volumes pose challenges in oversight but are an important buffer for the sector. Future considerations revolve around the uncertain role and future of independent pullet growers who have no market guarantees.

3.1.2 EGG FARMERS OF NEW BRUNSWICK

The Egg Farmers of New Brunswick have no authority over pullet management in their province and everything done with pullets is voluntary. Seven out of eight pullet growers in the province are also egg producers. There

is a legislative gap in authority for pullets and different groups cover it in different ways. Pullet growers in New Brunswick therefore feel that they lack support on pullet care, management, and pricing, and hope that Pullet Growers of Canada may offer guidance in these areas. The interviewee representing the Egg Farmers of New Brunswick was not able to speak to why other provinces withdrew their membership, but expressed a need for a national voice for pullets, especially in light of new animal care requirements which are a pass/fail.

3.1.3 EGG FARMERS OF ONTARIO

The Egg Farmers of Ontario highlighted that the Start Clean-Stay Clean program is mandatory for pullet growers in Ontario and that Egg Farmers of Canada performs annual audits at all the farms. There is no Animal Care Program for pullets in Ontario, but Egg Farmers of Canada is currently developing one. Pullet pricing is done via collaboration with Quebec, with which Ontario has a close working relationship; 90% of Ontario's imported pullets originate in Quebec.

Pullet production volumes and pricing considerations are managed through a quota system and the board administers this for pullets. However, the Egg Farmers of Ontario believe a national and unified voice for pullets is essential, especially in the national environment. Pullet Growers of Canada should be empowered to advance the national interest for pullets to help provincial pullet sectors. They highlighted that Pullet Growers of Canada should have a clear mandate to which they should be held accountable, and that an annual evaluation of its progress and impact should be undertaken in order to ensure a benefit for the sector.

Egg Farmers of Ontario would like to see pullets under supply management across the country, as it would promote a healthy industry.

ANNEXE 1

INTERVIEW GUIDES

INTERVIEW GUIDE FOR MEMBERS

INTERVIEW GUIDE Pullet Growers of Canada – Strategic Plan 2024-28

Context

Pullet Growers of Canada strives to defend the interests of Canadian pullet growers as the source of support and expertise for all problems and processes related to pullet production.

To this effect, Pullet Growers of Canada is undertaking a strategic planning exercise to identify what, if any, aspects of pullet management could potentially benefit from greater representation throughout the egg value chain. In order to achieve its objective, Pullet Growers of Canada has engaged Groupe AGÉCO and Serecon to conduct interviews with the egg boards in each province.

Objectives of the interview

Given this context, the objective of the discussion is to better understand, on a province-by-province basis, how the authority to implement and monitor the Egg Quality Assurance™ certification, and the related requirements of the national Animal Care and Start Clean-Stay Clean® Programs, are ensured at the pullet stage of production.

More specifically, the objectives are to:

- **Identify the entities responsible for ensuring the programs implementation and compliance**
- **Identify how this may or may not differ for pullet growers, whether they are independent or integrated**
- **Identify the advantages and disadvantages of the current situation**
- **Clarify the value of representation for pullet growers**

Organization :

Name (title) :

Date:

Question 1 – What is your role in your organization? How familiar are you with the implementation of the Egg Quality Assurance (EQA) Certification Program and related requirements?

Question 2 – In your jurisdiction, what entity is responsible for implementing the Animal Care and Start Clean-Stay-Clean Programs amongst pullet growers?

Question 3 – How are implementation conducted and compliance monitored (e.g., verification, third-party auditing, record-keeping, reporting)? Does the process differ from that for egg producers?

Question 4 – When it comes to pullet growers, do program implementation and compliance differ for independent and integrated pullet growers (that is, pullet growers who are also egg producers)?

Question 5 – If there is no entity with the aforementioned authorizations, can you comment on why this is this the case? How are the related risks (e.g., reputational, biosecurity, financial) managed in your jurisdiction?

Question 6 – With respect to production management, how are pullet production volumes and pricing considerations managed in your jurisdiction?

Question 7 – In light of the above considerations with respect to animal care, biosecurity and production management, is the egg supply chain operating at optimal capacity in your jurisdiction?

Question 8 – If your organization is or was a member of Pullet Growers of Canada, what factors contribute to the maintenance or withdrawal of your organization's membership?

APPENDIX 3: OCTOBER TO DECEMBER 2023: INTERVIEWS WITH NON-MEMBER PROVINCES



**PULLET GROWERS OF CANADA STRATEGIC
PLANNING: SUMMARY OF NON-MEMBER
INTERVIEWS**

PRESENTED TO
PULLET GROWERS OF CANADA



DECEMBER 2023

PROJECT TEAM

AGÉCO

Jean-Michel Couture, Project Manager

Ryan Johnson, Analyst

Serecon

Bob Burden, Project Consultant and Subject Matter Expert

4. INTERVIEW SUMMARIES

4.1 NON-MEMBER INTERVIEWS

Interviews were conducted with 12 representatives of provinces or other agencies which are not currently members of the Pullet Growers of Canada. Representatives included pullet growers, egg producers, and members of the provincial egg boards from:

- British Columbia;
- Alberta;
- Saskatchewan;
- Manitoba;
- Newfoundland & Labrador;
- Nova Scotia;
- Prince Edward Island;
- Canadian Egg Industry Reciprocal Alliance;
- Farm Products Council of Canada;
- and Egg Farmers of Canada;

The objectives of these interviews were:

- regarding *Start Clean-Stay Clean* and the *Code of Practice for the Care and Handling of Pullets and Laying Hens*, to identify whether the *status quo* of pullet management was optimal in each province;
- to identify the basis for which a province may have withdrawn membership from Pullet Growers of Canada;
- to identify what criteria would need to be met for a province to renew membership with Pullet Growers of Canada;
- and to identify operational scenarios for the Pullet Growers of Canada and to explore the perceived advantages and disadvantages of each.

Interviewees were assured of the anonymity of their feedback in order to ensure an open and pragmatic dialogue; to this effect, the findings have been aggregated and presented according to the questions and operational scenarios which were proposed or emerged during discussions.

4.1.1 OVERARCHING SUMMARY

- Support for how Egg Farmers of Canada manages and consults with pullet growers on the two industry programs;
- Most egg producers grow their own pullets, so they understand the value in ensuring pullets are of a high quality, but acknowledge that growing pullets are simply a required step in producing eggs;
- There is no current reason compelling enough for provinces to consider membership with Pullet Growers of Canada;
- The scenario in which Pullet Growers of Canada is absorbed as a committee of Egg Farmers of Canada is the most desirable;

- Pullet quality and uniformity guidelines, supportive research, and representation of pullet growers as an association are additional activities which may bring value;
- There is no interest in having Pullet Growers of Canada complete inspections for the two industry programs.

4.1.2 PRODUCTION MANAGEMENT: REPRESENTATION OF AND SUPPORT FOR PULLET GROWERS

There are two primary programs in place to provide assurance that egg production is managed in a way which ensures the safety of eggs and the welfare of hens: *Start Clean-Stay Clean* and the *Code of Practice for the Care and Handling of Pullets and Laying Hens* which is the basis for the Animal Care Program; together, these programs comprise the consumer-facing assurance scheme, the *Egg Quality Assurance* program.

Interviewees expressed broad support for how Egg Farmers of Canada manages and consults with pullet growers regarding these two programs. The primary factor behind this support is that most egg producers grow their own pullets (integrated producers); they view growing pullets as a necessary step in producing eggs, i.e., growing pullets is simply a cost associated with producing eggs. Therefore, when an inspection takes place, inspectors look at both pullet barns and egg barns when on-site. Interviewees describe this arrangement as optimal and highlight that Egg Farmers of Canada has invested time into ensuring this relationship is effective and supportive, despite some frustration in previous years.

In the case of integrated producers (the majority), the feeling is widely that having a separate entity come onto the farm to conduct inspections would be sub-optimal. Not only was it described as administratively taxing, but it could present a biosecurity risk due to the increased foot traffic. Likewise, they describe little or no need for an additional entity to provide oversight or advice on changes to assurance schemes, as EFC and provincial boards are effectively ensuring pullet concerns are addressed.

In the case of independent growers, regulations exist in some provinces to ensure that independent growers are compliant with assurance schemes; where regulation does not directly address independent growers, egg producers appear to exert pressure on independent growers, since egg producers will not be able to produce eggs if their layers and facilities are not found to be compliant. Therefore, it appears to be the case in most provinces that inspections of independent growers are driven by egg producers.

Pricing is one aspect of pullet growing where there is little oversight or guidance. However, when a lack of a centralized price was raised as an issue, it was highlighted that having a such a price may not be desirable in every case since it could create market conditions in which pullet growers are not incentivized to improve the quality of their flocks.

4.1.3 PAST AND PRESENT RELATIONSHIP WITH PULLET GROWERS OF CANADA

Some of those interviewed represented provincial boards which had maintained membership with Pullet Growers of Canada, while others represented provincial boards which had not maintained membership at any time. Those that were members but withdrew felt that Pullet Growers of Canada no longer had a mandate following the decision of the Farm Products Council of Canada not to put pullets under supply management, feeling that other aspects of production management had sufficient oversight and support between Egg Farmers of Canada and provincial regulation.

It was noted that membership, in some cases, was maintained due to the motivations of individual board members who took with them the initial enthusiasm in Pullet Growers of Canada when they moved on. Where a provincial board never considered membership, it was due to the perception that what Pullet Growers of Canada aimed to do was either not sufficiently clear or was already addressed by provincial legislation or by Egg Farmers of Canada.

Related to the above was the notion of provincial influence. The loss of Manitoba as a member of Pullet Growers of Canada was seen as a major setback for the organization. It was perceived to be a critical province, the absence of which is perceived by other members as a signal.

In terms of what criteria would need to be met for provinces to consider membership, almost all interviewees describe that it is not desirable to have what they perceive as a duplication of effort and yet another organization to keep track of. It was expressed that a “compelling pitch” would need to be made for provinces to consider membership, but specific details on what qualifies as compelling were not readily volunteered. The general feeling is that membership would only be required if Egg Farmers of Canada were not satisfactorily managing pullet-related issues; if this were the case, however, most interviewees would prefer to work on improving the relationship with and management of Egg Farmers of Canada.

4.1.4 SCENARIOS

Interviewees were presented with or invited to suggest operational scenarios to test whether there is a perceived role for Pullet Growers of Canada in representing or advocating for pullets and pullet growers. The risks and benefits of each scenario were discussed, and some brief details offered on what would be required for these scenarios to be implemented.

IF PULLET GROWERS OF CANADA WERE DISSOLVED AS AN ORGANIZATION

The prospect of Pullet Growers of Canada ceasing to exist as an organization was presented to interviewees in order to prompt a reaction that may indicate whether there is perceived value offered by the organization and a risk in its loss. Among all interviewees, only one described this situation as a loss for pullet growers with the majority underscoring that Egg Farmers of Canada and the provincial boards are already integrating and acting on pullet and pullet grower interests well.

The participant who highlighted this as a risk suggested that the loss of Pullet Growers of Canada would represent a loss of the voice of pullet growers, noting that there are intricacies to growing pullets that the Egg Farmers of Canada doesn't completely understand; interestingly, it was noted that Egg Farmers of Canada has no real mandate to manage pullets. The need for pullet grower representation was therefore emphasized in light of the increasing attention pullet production is receiving. These comments, however, were not substantiated with a suggestion for how Pullet Growers of Canada could effectively represent growers, while noting supply management is not the answer.

IF PULLET GROWERS OF CANADA WERE A COMMITTEE OF EGG FARMERS OF CANADA

Among all others, the scenario in which Pullet Growers of Canada dissolves as an independent organization but is absorbed by the Egg Farmers of Canada as a committee was the most positively received. Owing to the fact that pullets are a part of the egg supply chain, it is felt that having two separate organizations is not optimal, since it doesn't reflect the reality of egg production. All participants felt that activities related to pullet growing should have greater representation at Egg Farmers of Canada, but that this representation should be built into the organization itself in order to ensure efficiency, reduce the administrative and financial burden on growers, and alignment on the needs and realities of pullet production and egg production.

One participant highlighted that this committee should be representative of the different types of production in place for pullet growing rather than according to geography.

In order for this to occur the following conditions would need to be met:

- Egg Farmers of Canada would need to be convinced of the benefit for egg farmers;
- the interpersonal conflicts which may exist between Pullet Growers of Canada and Egg Farmers of Canada would need to be resolved;

- Pullet Growers of Canada would have to be willing;
- and the purpose of the committee would need to be clearly defined.

Overall, it is believed that Egg Farmers of Canada has the existing infrastructure and willingness to ensure this scenario could be practical.

IF PULLET GROWERS OF CANADA WERE RESPONSIBLE FOR PULLET GROWER COMPLIANCE WITH START CLEAN-STAY CLEAN AND ANIMAL CARE CODE

The least popular scenario among participants was the one in which Pullet Growers of Canada becomes a kind of program manager for the two major programs under the Egg Quality Assurance program. Due to the majority of egg producers raising their own pullets, having separate entities come onto the farm to conduct inspections was not described as desirable for the following reasons:

- increased foot traffic in barns is a biosecurity risk;
- it is administratively inefficient;
- provincial egg boards and Egg Farmers of Canada are already managing these programs well, for pullets and layers, so this would be a duplication of effort;
- and it is financially undesirable.

On clarification that Pullet Growers of Canada would not be an additional entity coming onto farms, most interviewees described little need for additional oversight on code changes or other issues, due to the fact that most pullet growers are integrated growers and therefore represent themselves to provincial egg boards and Egg Farmers of Canada.

IF PULLET GROWERS OF CANADA ONLY REPRESENTED INDEPENDENT GROWERS

It was acknowledged by most participants that independent growers lack representation and that there are regional differences. However, it was noted that few jurisdictions have sufficient populations of independent growers for such an organization to have a meaningful impact on decisions regarding pullet growing and sale. They described this also as a risk due to the perception of a “two-tiered” system, where independent growers have official representation and integrated growers do not.

IF PULLET GROWERS OF CANADA WERE AN ASSOCIATION AND NOT AN AGENCY

A scenario which was proposed by one participant was one in which Pullet Growers of Canada were to aim for association status instead of agency status to simply advocate for pullet growers as a collective voice. Preconditions for this would primarily be an appetite among growers for such representation, and that there be no financial requirement to participate.

Reasons why this scenario would be desirable include the opportunity to discuss issues of pullet growing in a conceptual, apolitical way, and to convene growers to ensure the identification of needs. This scenario was perceived as likelier to be achievable given the lack of a financial requirement to participate and the understanding that the association would not be striving for any political power that may duplicate or come into conflict with that of the Egg Farmers of Canada.

It was acknowledged that this association status would not be needed if Pullet Growers of Canada were to be absorbed as a committee of Egg Farmers of Canada.

IF PULLET GROWERS OF CANADA BUILT AND MANAGED A “QUALITY” PROGRAM FOR PULLETS

A scenario which was proposed by one participant was one in which Pullet Growers of Canada were to develop a kind of quality standard for pullets. The standard should not be prescriptive or required, but could be used as a guideline for growers to ensure greater uniformity in their flocks. This scenario was proposed in light of the fact that Egg Farmers of Canada does not have a mandate over pullet quality in the same way that biosecurity and welfare are addressed by the two primary industry programs.

An example of why this might be desirable is that if a layer purchases a flock with 85% uniformity, the pullet grower may be eligible to receive a bonus payment and/or have the feed costs compensated. Such a pullet quality guideline could therefore represent a tool for pullet growers to negotiate on pricing.

However, it was also acknowledged that pullet quality, in some regions, is enforced by competition. The pullet-growing community is small enough that if there are quality concerns, egg producers can acknowledge these directly with pullet growers in an organic, informal way. Another critical issue would be how “quality” is defined and by whom. The criteria would need to be objective and collectively agreed-upon. Moreover, if a flock is deemed to be of an insufficient quality, the question of whether there would be corrective actions need to be answered.

The suggestion itself also represented the potential for Pullet Growers of Canada to adopt a primary function of “researching” issues related to pullets in order to recommend practices or other mechanisms which are in the interests of growers, egg producers, pullets, and the public. Across the board, the concept of a quality guideline and research support for pullet rearing was received with interest, but more information would be needed.

ANNEXE 1

INTERVIEW GUIDE

INTERVIEW GUIDE

PULLET GROWERS OF CANADA – STRATEGIC PLAN 2024-28

Context

Pullet Growers of Canada strives to defend the interests of Canadian pullet growers as the source of support and expertise for all problems and processes related to pullet production.

To this effect, Pullet Growers of Canada is undertaking a strategic planning exercise to identify what, if any, aspects of pullet management could potentially benefit from greater representation throughout the egg value chain. In order to achieve its objective, Pullet Growers of Canada has engaged Groupe AGÉCO and Serecon to conduct interviews with the egg boards in each province.

Objectives of the interview

Given this context, the objectives of the discussion are (1) to explore what mechanisms are in place or could be envisioned to ensure fair representation for pullet growers and the national interest, and if there are related gaps; and (2) to explore the role(s) Pullet Growers of Canada could play in addressing these gaps, if applicable.

Organization :

Name (title) : _____

Date:

Question 1 – How are pullet growers represented or supported with regards to Start Clean-Stay Clean, the Animal Care Code, production management, production risks, pricing considerations, and other concerns related to pullet management?

Question 2 – Please describe your past and present relationship with the Pullet Growers of Canada.

Question 3 – What criteria would need to be met in order for you to consider becoming a member of Pullet Growers of Canada?

Question 4 – In your opinion, would any of the below scenarios be viable as potential roles for Pullet Growers of Canada? Why or why not? Describe the potential risks and benefits.

Scenario 1 – If Pullet Growers of Canada ceased to exist entirely.

Scenario 2 – If Pullet Growers of Canada were a committee of the Egg Farmers of Canada instead of its own entity.

Scenario 3 – If Pullet Growers of Canada were to become the national program manager of Start Clean-Stay Clean and the Animal Care Program for pullet growers on behalf of other associations.

Scenario 4 – If Pullet Growers of Canada's only mandate were to provide oversight over and representation of independent pullet growers, and not integrated pullet-egg producers.

APPENDIX 4: DECEMBER 2023: REGULATORY SCAN



**PULLET GROWERS OF CANADA STRATEGIC
PLANNING: REGULATORY SCAN**

PRESENTED TO
PULLET GROWERS OF CANADA



DECEMBER 2023

OVERVIEW

The Pullet Growers of Canada (PGC) (originally the National Pullet Growers Association) was established by Manitoba, Ontario, and Nova Scotia in 2009 to represent pullets and pullet growers to ensure this critical node in the egg supply chain is resilient, supported, effective, and profitable.¹

The existence of PGC acknowledges the reality that Egg Farmers of Canada (EFC) and several provincial egg boards have no real mandate over pullets and pullet growers,² due to the majority of pullet growers being “integrated,” i.e., most egg producers grow their own pullets, or those who do not grow their own pullets purchase them from other egg producers who do grow their own pullets. The existence of PGC also acknowledges the population of independent pullet growers who only grow pullets and are therefore not represented at the provincial and national levels. In the case of integrated growers, however, our interviews suggest that pullet barns and egg barns are inspected during the same visit. In terms of representation, there is a designated pullet grower currently on the Production Management Committee of the EFC.

In 2012, public hearings were completed by the Farm Products Council of Canada (FPCC) to determine whether a Canadian Pullet Marketing Agency should be established. The FPCC appears to have recommended such action be taken, however, the Minister of Agriculture took no action on this recommendation.³

Despite not receiving agency status, PGC has continued to advocate for and represent the needs of all pullet growers, also undertaking cost of growing (COG) surveys to equip growers with insights that may be used to ensure optimization and profitability.⁴

REGULATORY SNAPSHOT

Of all provinces, Manitoba has the highest number of regulations for pullets, while some provinces appear to have no regulation for pullets. Interviews suggest that where there is no provincial legislation for pullets, pullet concerns are able to be managed by the provincial marketing board due to the low volume of pullets produced in these regions; also clear from interviews is that EFC manages the relationship with these growers well enough that pullet concerns are effectively addressed between provinces and EFC.

Reviewing the legislation and feedback from interviews suggests that independent pullet growers are subject to the same requirements as integrated growers due either to legislation (in some areas) or downward pressure from egg producers, who require pullets be produced according to a standard which would enable them to pass inspections.

While mechanisms exist in some provinces to control pricing, pullet prices are determined by buyers and sellers in all provinces. Interviews suggest this is optimal, owing to the fact that most pullet growers are integrated and view pullet growing as a cost of producing eggs. However, interviews also highlighted that the study of cost of growing for pullets undertaken by Pullet Growers of Canada was valuable to ensuring growers had some visibility on costs. Some provinces, such as Quebec, also provide insight into pullet pricing trends for the current and upcoming year. Growers describe these tools as helpful to ensuring they receive fair pricing when selling to producers other than themselves.

¹ <https://epc-pgc.ca/our-organization/>

² <https://www.country-guide.ca/daily/pullet-producers-seek-status-outside-the-egg/>

³ <https://www.canada.ca/content/dam/fpcc-cpac/images/50th/fpcc-50th-History-book-2022.pdf>

⁴ <https://epc-pgc.ca/our-actions/>

While all provincial egg boards highlight their producers comply with the Egg Quality Assurance program (and its two associated programs: Start Clean-Stay Clean and the Animal Care Program), no province directly addresses pullet flock quality through bespoke programs or legislation. Interviews suggest pullet flock quality is a key issue which, if addressed, could contribute to better pricing, a stronger and more resilient industry, and greater public assurance.

	BC	AB	SK	MB	ON	QC	NB	NS	PE	NL
Pullet Regulations Exist	Y	Y	Y	Y	Y	Y	N	Y	N	Y
EQA (SC-SC + NFACC)	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Pullet Quota is Established	N	N	N	Y	Y	N	N	Y	N	N
Pullet Pricing is Regulated	N	N	N	?	N	Y	N	N	N	N

BRITISH COLUMBIA

REGULATIONS

- [Natural Products Marketing \(BC\) Act \[RSBC 1996\] Chapter 30](#)
 - Current as of 2023 December 06
 - Does not address pullets
 - Allows for the marketing board to establish biosecurity programs
 - Stipulates the constitution and authority of the marketing board
- [British Columbia Egg Marketing Scheme, 1967](#)
 - Current as of 2023 December 12
 - Does not address pullets
 - Addresses quota, licences, levies, sales verification, and the constitution and powers of the egg marketing board over eggs
- [Animal Care Codes of Practice Regulation, BC Reg 34/2019](#)
 - Current as of 2023 December 05
 - Enshrines in provincial legislation the NFACC *Code of Practice for the Care and Handling of Pullets and Laying Hens* (2017)

DESCRIPTION

In British Columbia, there is no legislation which directly addresses pullets other than that which enshrines the NFACC code of practice.

Pricing is not regulated and quota for pullets is not in place. Interviews with stakeholders describe this as optimal, since buyer-seller negotiation and competition between sellers ensures flock quality.

EFC and the egg board together complete inspections against the two national programs.

ALBERTA

REGULATIONS

- [Standards and Administration Regulation, Alta Reg 267/200](#)
 - Current as of 2023 December 06
 - Pertains to manure storage and other operational aspects
- [Alberta egg Producers Plan Regulation, Alta Reg 258/1997](#)
 - Current as of 2023 December 06
 - Stipulates the constitution and authority of the marketing board
 - Pullets designated as regulated agricultural products under the plan
- [Egg Farmers of Alberta Plan Regulation, Alta Reg 26/2022](#)
 - Permits required in order to raise pullets
 - Permits required to raise more pullets than existing permit allows
 - Producers must keep record of pullet mortality; date, age, and number of pullets purchased and the name of the seller; and the date, number, and location of pullets sold or disposed of
 - Hatchery people must declare information related to the production, sale, and delivery of pullets
- [Hatching Eggs Regulation, Alta Reg 280/1997](#)
 - Licensing of pullet growers, conditions and restrictions thereon
 - Stipulations regarding breeder pullets

DESCRIPTION

In Alberta, pullets are a regulated agricultural product and permits are required to grow pullets.

Pricing is not regulated and quota for pullets is not in place. Interviews with stakeholders describe this as optimal, since buyer-seller negotiation and competition between sellers ensures flock quality.

EFC and the egg board together complete inspections against the two national programs. Independent pullet producers are inspected for SC-SC and NFACC compliance due to downward pressure from egg producers; this is also believed to be the case for pullet growers in other jurisdictions.

SASKATCHEWAN

REGULATIONS

- [The Animal Protection Regulations, 2018, RRS c A-21.2 Reg 1](#)
 - Current as of 2023 December 11
 - Prescribes the NFACC *Code of Practice for the Care and Handling of Pullets and Laying Hens* (2017)

DESCRIPTION

There is no pullet regulation in Saskatchewan, other than that which enshrines the NFACC code of practice.

MANITOBA

REGULATIONS

- [Manitoba Egg and Pullet Producers Marketing Plan Regulation, Man Reg 70/2005](#)
 - Current as of 2023 May 18
 - Stipulates the constitution and authority of the marketing board
- [Egg and Pullet Producer Registration Order, Man Reg 290/2014](#)
 - Current as of 2023 May 18
 - Requires pullet producers to be registered and that they pay fees to the board
 - Requires allotment of quota to raise pullets
- [Egg and Pullet Information Order, Man Reg 170/89](#)
 - Current as of 2023 May 18
 - Requires producers to provide information regarding pullet growing and marketing
- [Pullet Production Quota Order, Man Reg 127/98](#)
 - Current as of 2023 May 18
 - Regulates the allocation of pullet quota
 - Stipulates that non-integrated growers may not raise or keep more than 299 laying hens
 - Prescribes the NFACC *Code of Practice for the Care and Handling of Pullets and Laying Hens* (2017)
- [Pullet Penalty Levies Regulation, Man Reg 231/89](#)
 - Current as of 2023 May 18
 - Defines penalty levies for certain pullet growing infractions
- [Pullet Administration Fee Regulation, Man Reg 220/2004](#)
 - Current as of 2023 May 18
 - Defines fees to be paid by pullet growers to the marketing board

- [Egg and Pullet Penalty Levies Regulation re Quality Assurance Program Compliance, Man Reg 123/2012](#)
 - Current as of 2023 May 18
 - Defines penalty levies to be paid by pullet growers under certain circumstances related to quality risks, such as raising pullets in facilities which are not certified as compliant with the board quality assurance program
- [Pullet and Egg Quotas, Man Reg 164/72](#)
 - Current as of 2023 May 18
 - Defines requirements related to growing pullets under quota

DESCRIPTION

Manitoba appears to have the highest number of regulations regarding pullets and pullet growing. Pullets are regulated agricultural products under supply management, however, non-integrated producers may grow pullets so long as the number of pullets is not in excess of a certain number. Independent and integrated growers are subject to the same requirements regarding quality assurance and animal care.

ONTARIO

REGULATIONS

- [Egg Farmers of Ontario Egg Quota Policy](#)
 - Defines rules for egg producers related to quota; regarding pullets, lays out requirements related to inspections before placement and obtaining pullet orders
 - Requires quota holders to meet all requirements based on the NFACC *Code of Practice for the Care and Handling of Pullets and Laying Hens* (2017)
 - Requires egg quota holders to use pullets certified under the On-Farm Food Safety (OFFS) Program and Animal Care Program
- [Egg Farmers of Ontario Policies, Programs & Procedures \(2011\)](#)
 - Defines independent pullet growers as those who have pullet quota but not egg quota
- [Egg Farmers of Ontario General Regulations \(December 2021\)](#)
 - Identifies “pullet dealers” as those who market or act as brokers for the marketing of pullets, including hatcheries that market pullets
 - Stipulates that pullets are grown on a quota basis other than noted exceptions
 - Defines requirements of pullet growers, including information sharing regarding production management aspects such as mortality
 - Defines requirements for pullet brokers/dealers and for hatcheries marketing pullets
- [Eggs - Marketing, RRO 1990, Reg 407](#)
 - Defines the authority of the provincial egg marketing board
 - Does not mention pullets

- [Levies or Charges - Hatching Eggs and Chicks \(over Quota\), RRO 1990, Reg 86](#)
 - Defines levies to be paid on production in excess of quota, including for pullets
- [Eggs - Plan, RRO 1990, Reg 409](#)
 - Defines the requirement to have representation of pullet growers on the provincial marketing board

DESCRIPTION

Ontario regulates the production of pullets under supply management, which affects both egg producers and independent pullet growers. Some growers who grow under a certain number of pullets per calendar year are not under supply management. Producers are required to ensure pullets are grown or sourced in compliance with the OFFS and Animal Care Program.

QUEBEC

REGULATIONS

- [Règlement sur les quotas des producteurs d'œufs de consommation du Québec](#)
 - Defines operational requirements related to housing and the provision of information
- [Plan conjoint des producteurs d'œufs de consommation et de poulettes du Québec](#)
 - Defines the function of a committee for the production and marketing of pullets, including pricing and recommendations to the federation on concerns of pullet producers
- [Règlement sur les conditions de production et de conservation à la ferme et sur la qualité des œufs de consommation](#)
 - Defines when quality assurance testing should be completed for pullets
- [Règlement sur les conditions de production des poulettes](#)
 - Defines conditions for the production of pullets, including providing information regarding testing and mortality, and sanitation, and other production management aspects
- Règlements sur la mise en marché des poulettes (no link provided and no version available)

DESCRIPTION

Quebec provides a pricing trend for the current and upcoming year to capture the price per chick. According to the FPCC (2014),⁵ Quebec has legislation which allows for quota, but quota is not currently in place in the province according to input from stakeholders.

NEW BRUNSWICK

REGULATIONS

None

⁵ https://publications.gc.ca/collections/collection_2014/cpac-fpcc/A99-1-8-2014-eng.pdf

DESCRIPTION

No regulations exist for pullets in New Brunswick.

NOVA SCOTIA

REGULATIONS

- [Nova Scotia Egg Producers' Egg Regulations, NS Reg 55/2020](#)
 - Requires that pullet producers adhere to the NFACC *Code of Practice for the Care and Handling of Pullets and Laying Hens* (2017)
 - Identifies non-commercial pullet quota holders
 - Requires permits to order pullets
- [Egg Farmers of Nova Scotia Marketing Plan, NS Reg 239/1982](#)
 - Defines the regulations related to producing pullets under quota
 - Stipulates that one board member must be a pullet producer
- [Egg Producers' Marketing Plan, NS Reg 239/82](#)
 - Defines the authority of the marketing board over pullet production
- [Egg Producers' Pullet Regulations, NS Reg 145/86](#)
 - Defines pullet quota requirements and levies
- Poultry Insurance Plan, NS Reg 339/2007
 - Provides for insurance against the loss of pullets and other poultry due to disease

DESCRIPTION

Nova Scotia has established supply management for pullets and has also legislated insurance for pullet producers against losses due to disease.

PRINCE EDWARD ISLAND

REGULATIONS

None

DESCRIPTION

No regulations exist for pullets in Prince Edward Island.

NEWFOUNDLAND AND LABRADOR

REGULATIONS

- [Egg Regulations, NLR 33/00](#)
 - Defines the requirement to have a permit for the purchase of pullets and the levy to be charged if pullets are purchased without a permit
- [Animal Protection Standards Regulations, NLR 36/12](#)
 - Requires pullets to be produced in compliance with the NFACC *Code of Practice for the Care and Handling of Pullets and Laying Hens* (2017)
- [Egg Scheme, 2000, NLR 32/00](#)
 - Defines regulations related to quota for egg producers

DESCRIPTION

Newfoundland and Labrador requires permitting and licensing for the production and purchase of pullets.

APPENDIX 5: JANUARY 2024: STRATEGIC RECOMMENDATION



**PULLET GROWERS OF CANADA
STRATEGIC PLANNING WORKING SESSION**



08 December 2023



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Agenda

60 min

08 December 2023

- 1 Recap on our objectives and process
- 5-10 minutes
- 2 Interviews: What we heard from members
- 5 minutes
- 3 Interviews: What we heard from non-members
- 10 min
- 4 Recommendations
- 10 min
- 5 Discussion
- 25 min
- 6 Next steps
- 5 min

PROJECT OVERVIEW

Objectives

- Consult stakeholders to explore if and how there is a strategic and impactful role for the PGC
 - Are stakeholders satisfied with the *status quo*?
 - Past and present relationship with PGC
 - Test and invite operational scenarios for PGC

Process

- Interviews conducted with members (3) and non-members (13) of PGC
 - All regions of Canada were represented
 - EFC, FPCC, CEIRA were represented
- Feedback analyzed and discussed internally
- Recommendation prepared based on stakeholder input

3

INTERVIEWS: WHAT WE HEARD FROM MEMBERS

- There is a need for pullet growers to have a collective voice
- Program implementation and compliance differ on a regional basis
- There is a desire for greater standardization of pullet growing
- PGC should be empowered as a representative authority, but held accountable to its mandate



4

INTERVIEWS: WHAT WE HEARD FROM **NON-MEMBERS**

Production management and representation

- Broad support for EFC's current oversight and support (despite having no specific mandate over pullets)
- Improving relationship
- Pullets receiving more attention
- EFC does not adequately address pricing or **pullet quality**

5

INTERVIEWS: WHAT WE HEARD FROM **NON-MEMBERS**

Past relationship with PGC

- Membership was due to:
 - The enthusiasm of certain individual provincial board members;
 - The prospect of supply management for pullets;
 - And “peer influence”

Present relationship with PGC

- Members withdrew due to:
 - No supply management;
 - The loss of Manitoba as a member;
 - The departure of certain individuals from provincial boards;
 - Duplication of effort or the perception of no need;
 - And cost-saving.
- COG an important contribution, but otherwise no clear understanding of PGC's mandate

6

INTERVIEWS: WHAT WE HEARD FROM **NON-MEMBERS**

What if PGC were dissolved?

- General agreement that a voice for pullet growers is needed;
- General agreement that pullet quality = layer and egg quality;
- However, there is broad consensus that there would be little to no impact if PGC were dissolved.

7

INTERVIEWS: WHAT WE HEARD FROM **NON-MEMBERS**

PGC absorbed as a committee of EFC

- The most positively received scenario among participants;
- Represents the broad majority: pullet growers are also egg producers;
- Administrative efficiency for growers in dealing with only one organization;
- And EFC already has the capacity to do this.

Conditions

- EFC would need to be convinced of the need and benefit;
- PGC would need to be willing;
- A clear mandate would be required;
- And based on production-type rather than region.

8

INTERVIEWS: WHAT WE HEARD FROM **NON-MEMBERS**

PGC as a “program manager” for SC-SC and animal care

- No desire for this among participants;
- EFC and egg boards already doing a good job;
- Biosecurity risk of having too many people on farms;
- And administratively and financially undesirable to have two organizations doing this.

9

INTERVIEWS: WHAT WE HEARD FROM **NON-MEMBERS**

PGC as a voice for independent growers only

- Acknowledgement exists that independent growers lack representation, however, there are insufficient numbers for this to be effective or impactful;
- And it would create a “two-tiered” system, which is perceived as undesirable.

10

INTERVIEWS: WHAT WE HEARD FROM **NON-MEMBERS**

PGC as an association rather than an agency

- Easier to achieve than agency-status
- All growers' voices could be represented without duplicating the administrative activities of EFC
- Opportunity to conduct stakeholder engagement and research to support pullet industry

Conditions

- EFC does not accept the idea of a pullet committee
- An appetite among growers for representation
- A clear purpose
- Financially accessible

11

INTERVIEWS: WHAT WE HEARD FROM **NON-MEMBERS**

PGC develops a "quality standard"

- EFC does not address pullet quality;
- Higher quality flocks give growers greater negotiating power on price;
- And represents a mandate of "research and support."

Conditions

- The question of whether it should and how it would be prescribed and enforced;
- Collectively and objectively developed;
- And an appetite for such a standard exists.

12

INTERVIEWS: WHAT WE HEARD FROM **NON-MEMBERS**

Overview

- Broad support for EFC;
- Pullets acknowledged as critical, but majority of pullet growers are also egg producers;
- No current reason compelling enough for provinces to consider membership with PGC;
- The scenario in which PGC is a committee of EFC is the most desirable;
- Pullet quality and uniformity guidelines, supportive research, and representation of pullet growers as an association are additional activities which may bring value;
- And there is no interest in having PGC complete inspections for the two industry programs.

13

REGULATORY SNAPSHOT

	BC	AB	SK	MB	ON	QC	NB	PEI	NS	NL	
Regulation for pullets	EFC and Province						EFC		EFC and Province		EFC and Province
Quota		Permits		EFC and Province			EFC		EFC and Province	Permits	
SC-SC inspections	EFC and Province	EFC and Province	EFC and Province	EFC and Province	EFC and Province	EFC and Province	EFC	EFC	EFC and Province	EFC and Province	
Animal Care	NFACC Legislated		NFACC Legislated	NFACC Legislated	EFC and Province				NFACC Legislated	NFACC Legislated	
Pricing	buyer-seller	seller	buyer-seller	buyer-seller; legislation exists	buyer-seller	buyer-seller	buyer-seller	buyer-seller	buyer-seller; legislation exists	buyer-seller	

- Most provinces have legislation regarding pullets, but comprehensiveness varies
- Quota exists for MB, ON, QC, and NS
- Pricing is largely determined between buyer and seller, but COG are supportive
- No material regulatory developments since FPCC submission

14

RECOMMENDATIONS FOR DISCUSSION

Recommendation

- Petition EFC to become a committee which undertakes research and engagement to ensure high-quality pullet growing

Consequences

- Pullets and pullet growers have stronger representation;
- And broad acceptance by stakeholders due to:
 - Administrative efficiency of having only one organization for the industry
 - No additional fee

15

RECOMMENDATIONS FOR DISCUSSION

Recommendation

- Dissolve PGC as an organization
- Collaborate with interested provincial producer groups to develop a regional association for pullet growers

Consequences

- No perceivable impact on pullet growers according to feedback received;
- Would need to ensure pullet-growing costs are integrated into EFC's costs of production;
- And provincial producer associations could take leadership in creating a provincial / regional association to represent pullet growers.

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THANK YOU

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APPENDIX 6: FEBRUARY TO MAY 2024: PRODUCER SURVEY



PLANIFICATION STRATÉGIQUE DES ÉLEVEURS DE POULETTES DU CANADA

MARS 2024

CONTEXTE

Les Éleveurs de poulettes du Canada (EPC) se sont retrouvés à la croisée des chemins en ce qui concerne leur mandat organisationnel et leur capacité à représenter les producteurs de poulettes à travers le Canada.

Dans le cadre de son processus de planification stratégique, l'EPC a mandaté deux sociétés canadiennes de conseil en agroalimentaire (Groupe AGÉCO et Serecon) pour mener des entretiens avec les membres de l'industrie dans le but de déterminer si et comment les besoins des producteurs de poulettes sont et pourraient être représentés de la manière la plus optimale.

Plusieurs scénarios ont été envisagés pour les EPC. Le scénario selon lequel les EPC deviendraient un comité des POC a été de loin le plus populaire, répondant au besoin d'une plus grande représentation des poulettes et des producteurs de poulettes sans l'administration supplémentaire d'une deuxième organisation.

Afin de faire avancer ce scénario, une consultation plus approfondie des parties prenantes est nécessaire pour identifier la demande globale correspondante, les forces, les faiblesses, les opportunités et les menaces.

En tant que producteurs de poulettes, votre voix et votre point de vue sont essentiels à ce processus. Nous vous invitons donc à répondre à ce bref sondage.

Il ne vous faudra pas plus de 5 minutes pour y répondre. Vos réponses seront utilisées pour informer les orientations stratégiques des EPC en ce qui concerne son avenir en tant qu'organisation.

Vos réponses resteront confidentielles.

SONDAGE

Le scénario proposé est que **les Éleveurs de poulettes du Canada se dissolvent en tant qu'association nationale et deviennent un comité des Producteurs d'œufs du Canada.**

1. Quelle est votre première réaction lorsque vous avez entendu parler de la proposition de dissolution des EPC et de son intégration dans les POC ?
 - () Très positive
 - () Plutôt positive

- Neutre
- Plutôt négative
- Négative

Facultatif : Avez-vous des préoccupations concernant la dissolution potentielle des Éleveurs de poulette du Canada pour en faire un comité relevant des Producteurs d'œufs du Canada ?

2. Selon vous, dans quelle mesure Les producteurs d'œufs du Canada (POC) comprennent-ils actuellement les défis et les besoins particuliers des producteurs de poulettes ?
- Compréhension incomplète
 - Assez incomplète
 - Plus ou moins complète
 - Compréhension complète
 - Je ne sais pas

Facultatif : Quels sont les défis et les besoins spécifiques qui pourraient ne pas être suffisamment compris ?

3. Pensez-vous que vos intérêts et vos besoins en tant que producteur de poulettes seraient représentés de manière adéquate au sein des POC par un comité des poulettes nouvellement créé ?
- Oui
 - Non
 - Incertain

Facultatif : Y a-t-il des domaines spécifiques dans lesquels vous pensez que les intérêts des producteurs de poulettes pourraient être compromis par ce changement ?

4. Sur la base de ce que vous savez aujourd'hui, seriez-vous favorable à la proposition de dissolution des EPC et à sa transformation en un comité au sein des POC ?
- Oui
 - Non
 - Incertain

Facultatif : Pourquoi préféreriez-vous que les EPC reste une organisation indépendante ou qu'elle devienne un comité des POC ?

5. Pensez-vous que ce changement aura une incidence sur vos activités quotidiennes en tant que producteur de poulettes ?

- Oui
- Non
- Je ne sais pas

Facultatif : De quelle façon?

6. Quelle importance accordez-vous au fait que les éleveurs de poulettes disposent d'une organisation dédiée qui représente leurs intérêts ?

- Pas important
- Assez important
- Très important
- Je ne sais pas

Facultatif : Pourquoi ?

7. Quels sont les avantages spécifiques que vous attendez de l'intégration des Éleveurs de poulettes du Canada au sein des Producteurs d'œufs du Canada ? Énumérez jusqu'à trois avantages, le cas échéant.

- (_____) _____
- (_____) _____
- () _____

8. Quelles sont vos attentes concernant la représentation des producteurs de poulettes au sein du comité des Producteurs d'œufs du Canada ?

QUESTIONS DÉMOGRAPHIQUES

9. Dans quelle province/territoire êtes-vous situé ?

- AB
- BC

- MB
 - NB
 - NL
 - NS
 - ON
 - PEI
 - QC
 - SK
 - Yukon
 - Territoires du Nord-Ouest
 - Nunavut
10. Veuillez indiquer le type de production de poulettes qui décrit le mieux votre exploitation :
- Producteur indépendant (poulettes uniquement)
 - Producteur intégré (poulettes et œufs)
 - Autre. Précisez :
11. Quelle est la capacité totale de votre (vos) bâtiment(s) d'élevage de poulettes ?
- 1 à 9 999
 - 10 000 à 24 999
 - 25 000 à 49 999
 - 50 000 ou plus
12. Depuis combien d'années élevez-vous des poulettes ?
- 0 à 9 ans
 - 10 à 19 ans
 - 20 à 29 ans
 - 30 ans ou plus
13. Outre Les Éleveurs de poulettes du Canada, les producteurs d'œufs du Canada et l'office des œufs de votre province, avez-vous d'autres affiliations qui répondent à vos besoins en tant que producteur de poulettes ?



PULLET GROWERS OF CANADA: STRATEGIC PLANNING

MARCH 2024

CONTEXT

Pullet Growers of Canada (PGC) has found itself at a crossroads regarding its organizational mandate and capacity to represent pullet growers across Canada.

As a part of its strategic planning process, PGC has mandated two Canadian agrifood consultancies (Groupe AGÉCO and Serecon) to conduct interviews with industry members with the objective of identifying whether and how the needs of pullet growers are and could be represented in the most optimal way.

Several scenarios for PGC were considered. The scenario of PGC becoming a committee of EFC was by far the most popular, responding to the need for greater representation of pullets and pullet growers without the additional administration of a second organization.

In order to advance this scenario, further stakeholder consultation is required to identify the corresponding overall demand, strengths, weaknesses, opportunities, and threats.

As pullet growers, your voice and perspective are critical to this process. We therefore invite you to complete this brief survey.

This survey should not take more than 5 minutes to complete. Your answers will be used to inform PGC's strategic orientations with respect to its future as an organization.

Your answers will remain confidential.

SURVEY QUESTIONS

1. Please indicate the type of pullet production which best describes your operation:
(drop-down menu)
 - Independent grower (pullets only)
 - Integrated producer (pullets and eggs)
 - *I am not a pullet grower -> survey ends here ("Thank you for participating. This survey is for pullet growers")*

The proposed scenario is that **Pullet Growers of Canada dissolves as a national association, becoming instead a committee of the Egg Farmers of Canada.**

2. What is your initial reaction to hearing about the proposal for PGC to dissolve and integrate with EFC?
- Very positive
 - Somewhat positive
 - Neutral
 - Somewhat negative
 - Negative

Optional: Do you have any concerns regarding the potential dissolution of Pullet Growers of Canada to become a committee under Egg Farmers of Canada?

3. How well do you think Egg Farmers of Canada (EFC) currently understands the unique challenges and needs of pullet growers?
- Incomplete understanding
 - Somewhat incomplete
 - Somewhat complete
 - Complete understanding
 - I don't know

Optional: What specific challenges and needs may not be sufficiently understood?

4. Do you feel that your interests and needs as a pullet grower would be adequately represented within EFC with a newly established pullet committee?
- Yes
 - No
 - Unsure

Optional: Are there any specific areas where you feel pullet growers' interests might be compromised by this change?

5. Based on what you know now, would you support the proposal for PGC to dissolve and become a committee within EFC?
- Yes
 - No
 - Undecided

Optional: Why would you prefer to maintain PGC as an independent organization, or support the transition into a committee of EFC?

6. Do you believe this change will impact your day-to-day operations as a pullet grower?
- Yes
 - No
 - I don't know

Optional: How so?

7. How important is it for you that pullet growers have a dedicated organization representing their interests?
- Not important
 - Somewhat important
 - Very important
 - I don't know

Optional: Why so?

8. What specific benefits do you anticipate from the integration of Pullet Growers of Canada into Egg Farmers of Canada? List up to 3 benefits, if any.
- _____
 - _____
 - _____

9. What are your expectations regarding the representation of pullet growers and growing within the Egg Farmers of Canada as a committee? (open-ended)

DEMOGRAPHIC QUESTIONS

10. In which province/territory are you located?

(drop-down selection)

- AB
- BC
- MB
- NB
- NL
- NS

- ON
- PEI
- QC
- SK
- Yukon
- Northwest territories
- Nunavut

11. What is the total capacity of your pullet barn(s)?

(drop-down menu)

- 1 to 9,999
- 10,000 to 24,999
- 25,000 to 49,999
- 50,000 or more

12. For how many years have you been growing pullets?

(drop-down menu)

- 0 to 9 years
- 10 to 19 years
- 20 to 29 years
- 30 or more years

13. Other than Pullet Growers of Canada, Egg Farmers of Canada, and your provincial egg board, do you have any other affiliations which support your needs as a pullet grower?

14. If you would like to receive PGC's newsletter, please enter your email address:

APPENDIX 7: MARCH TO MAY 2024: JOINT WORKING GROUP PROPOSAL



PULLET GROWERS OF CANADA STRATEGIC PLANNING WORKING SESSION

March 26, 2024



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AGENDA

- | | | |
|---|---------------------------|------------|
| 1 | Context and Objectives | 10 minutes |
| 2 | The Proposed Option | 5 minutes |
| 3 | Discussion and Next Steps | 30 minutes |

CONTEXT AND OBJECTIVES

PGC IS AT A CROSSROADS

- The update of the strategic plan:
 - An opportunity to reflect on the need for a national organization representing pullet growers
- Work accomplished so far:
 - A Regulatory Scan
 - A Stakeholder Consultation
 - A Strategic Workshop
 - A Producer Survey

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CONTEXT AND OBJECTIVES

KEY LEARNINGS

- Pullet growing is a **critical node** in the egg supply chain
- There is no **broad authority** over pullets and pullet growers nationally
- **Industry consultation** revealed that:
 - There is a desire for greater pullet representation
 - There is a desire for that representation to come from EFC

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THE PROPOSED OPTION

Through a transition process, to dissolve PGC to establish a new pullet representation entity steered by EFC

- What's in it for the industry?
 - Ensure a consistent control over the entire egg supply
 - Having the same high production standards applied from 1 to 70+ weeks
 - Enhanced risk management
 - A vehicle for coordinated dialogue
 - Administrative efficiency

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WHAT'S NEXT?

KEY MILESTONES AND TENTATIVE TIMELINES

- To complete the **producer survey** – Q2-2024
- Get **provincial buy-in** on the proposed option – Q2-2024
- To establish a **Joint Working Committee** – Q2-2024
- To draft and submit a **detailed transition plan** – 2025

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6

DISCUSSION

- Does the proposed option seem viable to you?
- What would most contribute to the success of this undertaking?
- Are there specific challenges to account for?

APPENDIX 8: MAY 2024: PRELIMINARY SURVEY RESULTS



PULLET GROWERS OF CANADA
STRATEGIC PLANNING

15 May 2024



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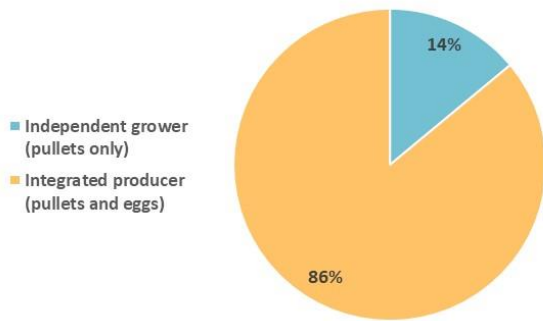
ON JOINING A JOINT WORKING COMMITTEE TO FACILITATE AN EFC PULLET COMMITTEE
PROVINCIAL BOARD DECISIONS

	Vote	Change Needed?	Recommendation for PGC	Recommendation for EFC	Comments
BC	✗	NO	-	-	EFC already includes input from pullet growers on critical areas
AB	✓	-	-	-	-
SK	✗	NO	PGC to dissolve	-	EFC already includes input from pullet growers on critical areas
MB	✗	NO	PGC to continue representing growers	-	EFC already includes input from pullet growers on critical areas
ON	✓	-	-	-	Agrees to support a joint working group
QC	✓	-	-	-	-
NB	✗	YES	-	EFC to facilitate pullet committee	EFC in collab. w/ provinces; membership withdrawn and letter to EFC submitted in support of committee
PEI	?	-	-	-	-
NS	✗	-	-	-	EFC's responsibility to facilitate pullet representation w/ provinces
NL	✗	-	-	EFC to facilitate pullet committee	EFC's responsibility to facilitate pullet representation w/ provinces

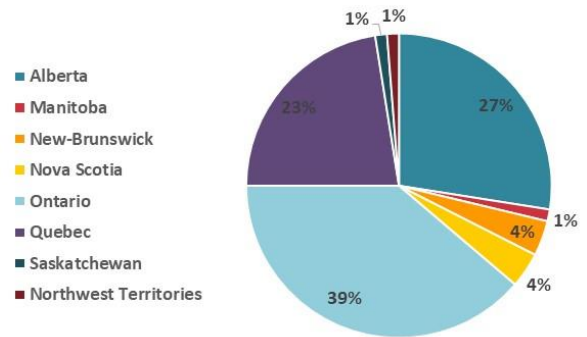
YES = 3 NO = 6 WAITING = 1

PRODUCER SURVEY RESULTS

Production type



Provincial representation

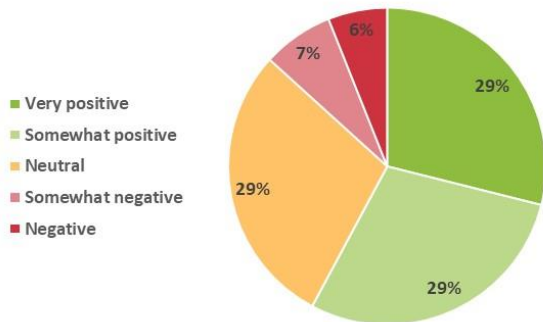


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PRODUCER SURVEY RESULTS

What is your initial reaction to hearing about the proposal for PGC to dissolve and integrate with EFC?



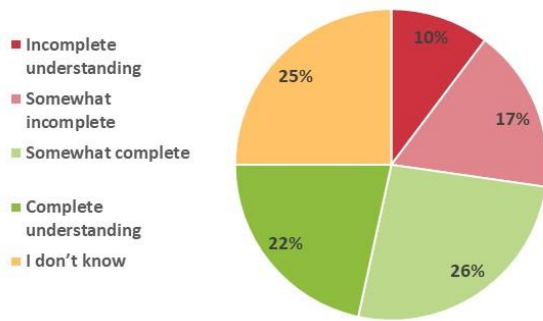
- Almost 60% feel positive about the dissolution of PGC and integrate with EFC (as a pullet committee)
- Indicates a desire for further integration, reflecting feedback heard during consultations

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PRODUCER SURVEY RESULTS

How well do you think Egg Farmers of Canada (EFC) currently understands the unique challenges and needs of pullet growers?



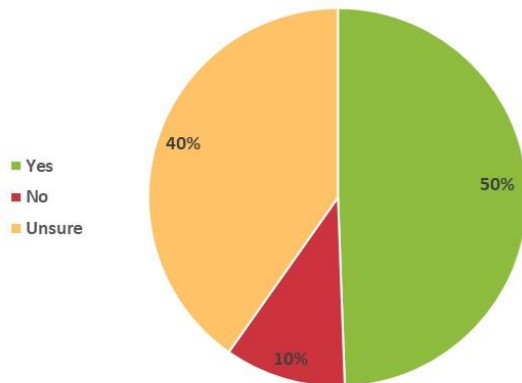
- Almost 50% of participants believe EFC has at least some understanding of pullet growers' needs.
- Fewer than 30% believed EFC did not understand.
- "Somewhat incomplete" and "Somewhat complete" may be combined, indicating that almost half (43%) believe there is some measure of improvement to be made in EFC's understanding on this matter.

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PRODUCER SURVEY RESULTS

Do you feel that your interests and needs as a pullet grower would be adequately represented within EFC with a newly established pullet committee?



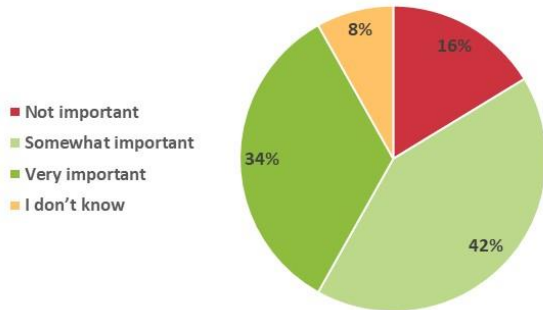
- Half of respondents believe the proposition of a committee is a good idea.
- However, a significant proportion are unsure, indicating that more information is needed to inform a decision.

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PRODUCER SURVEY RESULTS

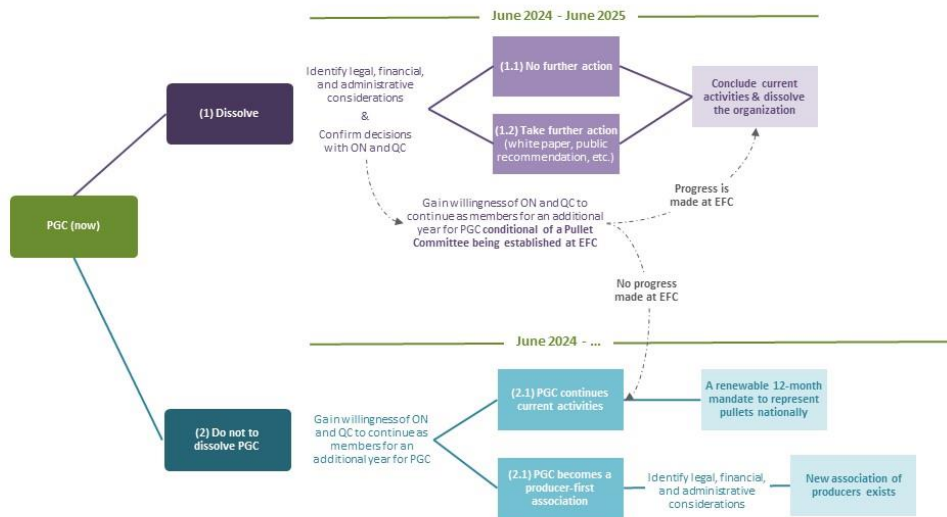
How important is it for you that pullet growers have a dedicated organization representing their interests?



- More than 70% of participants believe it is important to have an organization representing their interests.
- However, we cannot assume this means PGC, since

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To proceed according to the timelines of the ON and QC provincial board meetings, and according to key administrative dates, either the end of current calendar year (DEC 2024, 6 months) or the end of PGC's fiscal year (JUN 2025, 12 months)

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8

NEXT STEPS

