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August 26, 2015

**Via Email: Nathalie.Vanasse@agr.gc.ca
and Via Registered Mail**

Nathalie Vanasse, Registrar
Farm Products Council of Canada
Central Experimental Farm
Building 59
Ottawa ON K1A 0C6

Dear Ms. Vanasse

Re: Complaint pursuant to paragraph 7(1)(f) of the *Farm Products Agencies Act* with regard to Turkey Farmers of Canada's decision made on June 11, 2015, and with regard to the TFC Multiplier Breeder Policy and Turkey Farmers of Ontario (the "Complaint")

We act for Belwood Poultry Inc. ("**Belwood**") and write to request intervener status on behalf of Belwood in the above referenced Complaint.

Background

Belwood is an independent turkey breeder in Ontario and has been in the turkey breeding business since the 1960s, before supply management was in place in the turkey industry. Belwood is typically about 3% of the multiplier breeder market in Ontario.

Belwood was sold in 2014 and the new owners have undertaken a significant capital investment of more than \$14,000,000 (with more investment expected) in the breeding industry in Ontario. Their goal is to expand operations, support the Canadian multiplier breeder market, and export to the American market.

Belwood's interest in intervening and how it is affected by the Complaint

As one of two small turkey breeders in Ontario, Belwood was negatively impacted by the abuse of TFO rules that was carried out by the other market participants.

By fighting the Complaint, instead of passing the penalty along to those market participants responsible for the events giving rise to the Complaint, the TFO is supporting Belwood's much larger competitor(s).

Whether the Complaint is upheld or not will have a meaningful impact on the competitive environment in which Belwood operates and could affect the viability of its very significant investment into the Ontario breeding industry.

Belwood's unique information and perspective

This Complaint is between the TFC and the TFO, two regulators who represent a wide range of types of market participants and interests.

In contrast, as a small independent breeder in Ontario, who was harmed by the actions of those abusing the system, Belwood can provide the unique perspective of a market participant operating within the jurisdiction of the TFO who was harmed by the actions giving rise to the Complaint. Belwood can also explain how and why it supports certain actions of the TFC.

Further, as an operating breeder, Belwood will be able to provide unique information concerning breeding operations including how they operate and their economics.

Yours truly,

McCarthy Tétrault LLP

Per:

A handwritten signature in black ink, appearing to be 'S. Rogers', with a long horizontal line extending to the right.

Sam Rogers
SBR/mr

e.c. Geoff Hall