

January 29, 2016

Ms. Nathalie Vanasse Hearing Secretary Farm Products Council of Canada (FPCC) Central Experimental Farm, Building 59 960 Carling Avenue Ottawa, ON, K1A 0C6

Dear Ms. Vanasse,

This letter with attachment is further to a request made by Panel Chair Mike Picard on the occasion of the Public Hearing into the Proposal for a Canadian Pork Promotion and Research Agency (PRA). As you are aware, this first hearing was held in Calgary on January 19.

Specifically, the Chair asked that we (the Applicant) forward to your attention "...who the importers are that CMC [Canadian Meat Council] and CPI [Canada Pork International] represent?" The Chair's request and instruction for compliance is found at lines 11-14 on page 106 of the hearing's proceedings transcript that you kindly provided.

The information sought is provided in the attachment and represents, to the best of the Applicants knowledge, the relevant importers of pork and pork products into Canada that are members of and represented by CMC and CPI. We would of course defer to CMC or CPI should either have any issue with the manner in which we have characterized any of their members as "importers".

Thank you for you and your team's considerable efforts in organizing what we found to be a very professional and well-run public consultation and hearing in Calgary. We look forward to the second hearing in Montreal on February 16.

Yours sincerely,

Rick Bergmann

Chair

Canadian Pork Council

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Importers represented by the CMC

Processors

Of the approximately 31 members listed by the CMC with a "processing" designation (including beef, veal, lamb and pork), some 19 include the manufacture and/or import of pork within their product lines. There appears to be no reason to demean or dismiss the "importer" element of any of these 19. Nor is there reason to differentiate whether pork inputs are regularly imported as ingredients in the manufacture of their respective products, or are simply additional products that extend the range of a product line on offer to their customers in Canada or re-exported abroad. In short, they are essentially all manufacturers that, in most cases, rely on some degree of imports in order to complement or support their own product lines so as to remain competitive.

The above noted 19 "pork processors" are identified by the Applicant as follows:

Aliments Asta

Aliments Trans Gras

Beechgrove County Foods Inc.

Bronte Foods

Drummondville, QC

Scarborough, ON

Dieppe, NB

Mississess ON

Bronte Foods
Brandt Meats
Brandt Meats
Emballages C&C Packing, Inc.
Grand River Foods
Jadee Meat Products
Les Viandes Or-Fil Meats
Lesters Foods Ltd
Dieppe, NB
Mississauga, ON
St Leonard, QC
Cambridge, ON
Beamsville, ON
Laval, QC
Laval, QC

Maple Leaf Foods
Olymel
Orviande Inc.

Eavai, QC
Mississauga, ON
Boucherville, QC
Anjou, OC

Premier Meat Packers (2009) Inc.

Springer's Meats Inc.

TMF Foods

Viandes Seficlo Inc.

Viau Foods

Zadi Foods

Vaudreuil, QC

Hamilton, ON

Stoney Creek, ON

Becancour, QC

Montreal, QC

Brampton, ON

What cannot be suggested authoritatively is whether a given processor accesses imported product directly or via an intermediary such as a trader, or both, and to what degree this might occur. One might well suspect that they engage in using both avenues for acquiring such inputs. The degree to which they import through one channel (direct) or the other (via traders) might likely be a function of the given enterprise's size and urgency for the need of spot-supplies and/or the need to keep their product offerings broad by using some level of imports.

Traders

Of the approximately 23 CMC members categorized as "trading", near-all include pork within their product portfolios. For commercial confidentiality reasons, it is essentially impossible for the Applicant to attribute specific volumes or values to their respective imports into Canada. However, what might be objectively said is that as traders, they are in a position to easily move product into and out of Canada, as markets, demand and other sales opportunities warrant. As such, <u>any</u> given trader might be considered as a past importer of pork into Canada, or perhaps more importantly as an existing or <u>potential</u> importer. The only clear matter is that they would have an interest in a potential import levy, and to date the CMC has not raised any concerns from this grouping of its membership.

Meat "traders" represented by the CMC include:

Bassett & Walker International Inc. T
Bonnycastle Trading Ltd. V

Brecon Foods Inc. Canadian American Boxed Meat Corp

Canworld Foods Ltd. Chisholm, Ronald A. CommTrade Inc.

DASA International LLC
Eastern Meat Solutions
Export Packers Co. Ltd
HAP Foods International Ltd.

Kristom Canada LN Reynolds Co. Ltd. Mondial Foods PJ Impex Inc.

Retail Ready Foods Inc. Seapass Trading Inc. Terfloth & Cie (Canada)

Tri-Meats Inc

VLM Food Trading International West Shefford Food Co. Inc. Wilkinson Foods International Ltd.

WillTrade Commodities

Toronto, ON

Vancouver, BC Pointe-Claire, QC

Mississauga, ON Toronto, ON

Toronto, ON Montreal, QC

Atlanta, GA

Etobicoke, ON Brampton, ON

Saanichton, BC St Hyacinthe, QC

Brampton, ON Pittsburgh, PA

Montreal, QC Mississauga, ON

Repentigny, QC

Montreal, QC Illinois, IL

Kirkland, QC Toronto, ON

Mississauga, ON Orangeville, ON

Retailers/Foodservice

It is also noteworthy that CMC membership includes Metro Inc., Sobeys Inc./Safeway, and Sysco Canada. Although again for commercial confidentiality reasons, the degree to which these members import pork and pork products is not known by the Applicant. However, it would be wrong to suggest that they are not important members of their segment of the market. As such, they should be considered as having been included within the CMC's expression of its support for the PRA as well.

Importers represented by CPI

Packers and Processors

CPI represents the interests of some 18 pork packers and processors. As with the CMC, it is difficult to discern which of these imports cuts and pork products into Canada and if so, whether they are regular importers or perhaps simply filling a market-gap at a given point in time, or product line extenders as-and-when required, or when an opportunity otherwise presents itself. For example, the Applicant knows that Olymel and Maple Leaf Foods (i.e., the two largest members of CPI) import pork products on a consistent and ongoing basis. There would seem to be little doubt that the balance of the "processor" membership also engages in importing from time-to-time as well. Even if they happen not to be current importers, there is little doubt that they would still have an interest in raising any concerns given that they do not know what importance such products might play in their future business plans.

These packers and/or processors are identified by the Applicant as follows:

Aliments Asta Inc. St Alexandre, QC Aliments Lucyporc Yamachiche, OC Atrahan Transformation Inc. Yamachiche, QC C&C Packing Inc. St Leonard, QC

Canada First Brands/Willard Meats International Oakville, ON

Breslau, ON Conestoga Meat Packers Ltd. Donald's Fine Foods/Britco & Thunder Creek Pork Inc. Richmond, BC

Drummond Export Drummondville, OC

F. Menard/AGROMEX Inc. Ange-Gardien, OC

Gaspor Fermes/St Canut Farms St Jerome, QC Hylife Foods Neepawa, MN

Maple Leaf Foods Inc. Mississauga, ON Olymel, SEC/LP Boucherville, QC

Or-Fil Meats International/Deli-Porc Meatrs/LG Hebert Laval, QC Premier Meat Packers Inc. Vaudreuil, OC

Sunterra Meats Ltd. Acme, AB

Viandes Dubreton Inc. Riviere-du-Loup, OC Viandes Seficlo Inc. Becancour, QC

Traders

Likewise, CPI includes some 21 trading companies. As was mentioned previously with respect to CMC members, trading companies import and export by their very nature. This activity is dictated by market opportunities when-and-wherever they might be in the global pork market. Some import more regularly into Canada, but in fact they would all have an interest in a potential levy on Canadian imports given that they would anticipate more-than-likely importing pork and pork products at some eventual point...such is the nature of their business.

The Applicant has identified the following to be members of CPI:

B. Terfloth & Cie Montreal, OC Bassett & Walker International Inc. Toronto, ON Vancouver, BC Bonnycastle Trading Ltd. Brecon Foods Inc. Pointe-Claire, QC **CANAM Meats** Mississauga, ON Toronto, ON CANWORLD Foods Ltd. Commtrade Int Food Trading Inc. Montreal, QC DASA International Toronto, ON Brampton, ON Export Packers Co. Ltd. Great Ocean Food Co. Ltd. Richmond, BC **HAP Foods International** Saanichton, BC Kristom Canada Montreal OC Mondial Foods BV Montreal, QC PJ Impex Inc. Montreal OC Ronald A. Chisholm Ltd Toronto, ON Seapass Trading Inc Mascouche, QC Tri-Meats Inc. Aurora, ON VLM Foods Inc. Pointe-Claire QC West Shefford Food Co. Inc. Toronto, ON Wilkinson Foods International Inc. Toronto, ON WillTrade International Inc. Orangeville, ON

Associate Members

CPI also has a number of associate members that trade internationally. In general they move pork products into and out of Canada, however the significance of their dealings in this regard is not known to the Applicant. It can be assumed that had they any significant concerns with the proposed PRA, they would have made their intentions known. These members include:

AJC International Atlanta, GA ESS-Food Broendby, DK Galaxy Inc. Montreal, QC Bloomington, MN Lamex Foods Inc. Brampton, ON LN Reynolds Co. Ltd PAR Marketing Inc. Trois-Rivieres, QC SUMA Trade Group Inc. Etobicoke, ON Vestey Foods International Ltd. Coulsdon, UK