

Pooled Project Policy Guidelines

Canada- British Columbia Beneficial Management Practices Program (CBC - BMP)

Pooling of Funds

Pooling of funds can be an effective way to support multi-producer projects and may result in more BMPs being implemented across British Columbia. As well, it may facilitate the development of larger more effective and economically viable projects. This assumes that each producer has a valid EFP and is eligible for funding under the Canada- British Columbia Beneficial Management Practices Program.

Considerations:

- Many BMPs, such as manure treatment require significant capital investment and may require regulatory review. For many larger projects, program category caps can be easily reached and can inhibit the number of projects applied for. As such, it may be advantageous from a regulatory and economic perspective for producers to implement joint or pooled projects.
- Larger collaborative projects collectively address priority provincial agri-environmental issues, such as nutrient management and/or water quality. By supporting these types of projects a larger net benefit on the environment may be achieved.
- Many of the larger projects may require an environmental assessment such as CEAA or a similar provincial assessment process. To effectively apply an assessment, projects should be considered in their entirety. Splitting large pooled projects into separate practices will cause unnecessary assessment processes, which can delay project approval and add to administrative and producer's costs.
- Applications to the program are made on an individual basis. Recognizing this, direction is needed on how to ensure that pooled projects are administered correctly and that technical and administrative requirements (i.e. approvals, payments, environmental assessment) are implemented as efficiently as possible.

Policy

It is recommended that producers be allowed to apply for pooled projects, providing:

- Each applicant has a reviewed EFP and current Statement of Completion.
- They have discussed the project with their Planning Advisor and/or ARDCorp Program staff and have agreed that a pooled project may be the most appropriate and cost effective approach to developing the BMP.
- Pooled projects must be feasible from an economic, regulatory and environmental perspective.
- Each applicant needs to submit an individual application for their portion of the pooled project whether the project encompasses one or more BMP categories and/or codes. All applications from the participating farm operations related to the project must be submitted simultaneously. Applicants will indicate on their application that the project is a pooled project, the location of the project, and show breakdown of contributors and funding (applicant may need to attach an additional sheet as part of the application to show details of pooling arrangement). Applicants will apply for Growing

Forward BMP funding based on actual individual costs of the total project (i.e.: \$200,000 project and 4 applicants, each applicant applies to CBC BMP based on individual cost of \$50,000 assuming all applicants have an equal share in the project).

- Applicants will obtain all regulatory approvals, including any required environmental assessment as a group.
- Payments will be based on the actual cost incurred by that applicant as part of the group;
 - invoices for the project can be combined and then applicants will each claim their share of the total project costs, noting on the invoice what percentage is applicable to each applicant or;
 - contractors / vendors need to indicate the total invoiced costs and clearly identify which items or portion will reflect each producers contribution and producers will submit claims based on these invoices or;
 - where there are separate parts or practices to a project, such as a manure treatment facility, and applicants want to claim based on the part of the project they paid for (ie: applicant A pays for separator and applicant B pays for building to house separator), each applicant will submit their claim based on actual costs incurred for that part(practice) of the project
 - eligible payments are based on the individual category cap and the farm cap.
For example: a \$150 K project proposed by 3 farms under project code 0201 manure treatment. If each farm is sharing the cost equally – eligible costs are \$50 K each. The cap for each farm for this BMP practice is 30% to a maximum of \$30 K. Therefore 30% of \$50 K = \$15 K. Total cost to program is 3 times \$15 K or \$45 K
- All pooled projects may be inspected pre and post construction and every invoice verified to ensure that no duplication in payment occurs.
- No formal written agreement is required for a pooled project, however the application(s) must clearly identify which farm operations are involved and which portions of the project are attributed to each participant