

**From:** KEES LANGEREIS [REDACTED]  
**Sent:** Tuesday, January 27, 2026 10:11 AM  
**To:** Islands2050  
**Subject:** Draft TPS comments on its glossary  
**Attachments:** letter to Trust Council draft TPS glossary.pdf

Please find attached my comments on the Glossary section of the draft TPS.  
Thank you,  
Kees Langereis

**Date:** January 27, 2026

**To:** 2050 Islands Trust

**Re:** Trust Policy Statement - "Glossary of Terms" vs "Definitions"

**RECOMMENDATIONS:**

1. that the draft Trust Policy Statement (TPS) be amended to
  - (a) clarify that the Glossary applies to the words used in TPS policies, and
  - (b) amend the Glossary definitions accordingly by removing content not applicable to a legislated definition, and
2. that further public engagement on the changes occurs.

**My reasons are as follows:**

Definitions in a bylaw or any other form of legislation set guidelines for the interpretation of words. A more detailed definition limits the range of possible interpretations but provides greater clarity on the policy intent. Specificity rather than ambiguity in a definition is an important factor if the policy intent is to be achieved.

A glossary is generally a list of words or phrases with definitions and other information (e.g. background information) to aid the reader in understanding<sup>1</sup>. It is not usually intended to legally limit how a word or phrase is to be interpreted.

The text of some definitions in the TPS Glossary read more as an aid to understanding policies than a legal limit to the interpretation of the word or phrase.

If the Glossary is to act as a list of definitions, it should be clearly identified as having that purpose in the TPS bylaw and ensure that the wording of its definitions reflect that purpose and is readily understood by all.

**Background information:**

**Differences between the current and draft TPS:**

The current TPS bylaw has the following provisions:

In its "Organization" section of the bylaw:

*"Parts I, II, III, IV, and V and Schedule 1 of the "Islands Trust Policy Statement" attached to and forming part of the bylaw are hereby adopted as the trust policy statement pursuant to S.13(1) of the Islands Trust Act."*

and

in the "Introduction" section of the TPS: *"Schedule 1 provides definitions for some of the terms used in the document."*

It would seem that the Schedule is intended to direct how a word or phrase must be interpreted. I say "seem" because the "Introduction" section of the current TPS is not a legal

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<sup>1</sup> The Cambridge dictionary describes a Glossary as "an alphabetical list, with meanings, of the words or phrases in a text that are difficult to understand".

part of the official TPS bylaw and there is no specific provision in the TPS policies indicating the definitions in the Schedule apply to their use in other TPS provisions. Perhaps it does by virtue of the Schedule's title is "Definitions" but a heading in legislation is normally not binding and more a signpost or clarification of scope. But considering how bylaws and other forms of legislation usually make a statement to the effect the definitions apply to other provisions, I wonder whether this ambiguity has implications for its use in the current TPS.

The draft TPS replaced the Schedule of Definitions with a section 28 entitled "Glossary of Terms". As such, the Glossary is an integral part of the TPS bylaw.

However, there is no reference in the draft bylaw as to the Glossary's purpose which raises some uncertainty. The omission of a statement of purpose comparable statement could be construed as intending the definitions to be for information purposes only and that they do not direct how staff, trustees and the public are to interpret the defined word.

#### Development of the Glossary:

My understanding is that initially staff developed the Glossary but did not intend it to form part of the TPS bylaw which may account for there being no specific provision on its use. If staff did not see the Glossary as included in the bylaw, there would be less focus on the text of the definitions working as legislation.

This may explain why some of the Glossary "definitions" read more as a general description rather than the usual definition approach of "X means Y". The Glossary phrase "archaeological sites<sup>2</sup>" is defined but also includes a paragraph that is more a description of background information. I am not sure how one would incorporate that description as legal parameters of a definition. The Glossary phrase "Active Recreation<sup>3</sup>" is an example of the usual definition format.

However, if staff did not draft the Glossary for inclusion in the bylaw, when Trust Council subsequently decided it would be part of the bylaw, there should have been TPS amendments to achieve that effect.

Perhaps timing of the Trust Council decision to include the Glossary was also an issue which may account for TPS survey's omission of the Glossary. Regardless, the absence of the Glossary effectively precludes the public from reviewing and commenting on a critical piece of any legislation- its definitions.

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<sup>2</sup> Archaeological sites consist of the physical remains of past human activity.

All archaeological sites in British Columbia are protected under the Heritage Conservation Act. This applies whether sites are located on public or private land, and whether the site is known or unknown. Protected archaeological sites may not be altered or changed in any manner without a permit. There are over 60,000 archaeological sites recorded in BC's Provincial Heritage Register including the remains of village and other habitation sites, as well as resource procurement activities such as fishing weirs and culturally modified trees. These sites may date anywhere from recent times to 14,000+ years ago, and studies continue to uncover new information. (Source: BC Archaeology Branch)

<sup>3</sup> Active recreation means recreation that is of a formal nature, often performed with specific people or teams, requires specialized equipment or prescribed places, sites or fields, but excludes recreation that primarily involves the use of a power-driven conveyance.