

From: BCSGA Executive Director <ed@bcsga.ca>
Sent: Thursday, January 29, 2026 12:10 PM
To: Islands2050
Subject: Comment on amending the Islands Trust Policy Statement
Attachments: BCSGA Comments on IT Policy Statement January 2026.pdf

To whom it may concern,

Please find attached BCSGA's formal feedback on the Draft Policy Statement currently open to public engagement.

Kind regards,
Nico Prins
Executive Director, BCSGA

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January 29th, 2026

Islands Trust

Via email: islands2050@islandstrust.bc.ca

Comments on Draft Policy Statement (Bylaw 183) – Recognition and Treatment of Shellfish Aquaculture

To whom it may concern,

Thank you for the opportunity to provide comments on the Islands Trust Draft Policy Statement (Bylaw 183). I am writing to offer comments specific to shellfish aquaculture and its relationship to agriculture, environmental protection, and compatible uses within the Trust Area.

While shellfish aquaculture has historically raised concerns within Islands Trust planning processes, I view this Draft Policy Statement as an important opportunity to better align Trust policies with provincial direction, contemporary environmental science, and the Trust's stated objectives related to environmental stewardship, food security, and sustainable local economies.

1. Recognition of Shellfish Aquaculture as Agriculture (policy 3.5.11 – 3.5.16)

The Draft Policy Statement places strong emphasis on protecting agriculture, including commitments to:

- “identify and protect agricultural lands for current and future use,” and
- “consider land uses and activities that support the economic viability of farms without compromising the agricultural capability of the land.”

Shellfish aquaculture is recognized and protected by the Province of British Columbia as a form of agriculture. However, the draft Policy Statement does not clearly extend similar recognition or safeguards to marine-based food culture activities.

I respectfully recommend that shellfish aquaculture be explicitly acknowledged as an agricultural use within the Trust Area and that relevant agricultural protection policies be framed to include marine food production systems where appropriate. Without this clarity, there is a risk that shellfish aquaculture is implicitly treated as a discretionary or incompatible use, rather than as a legitimate agricultural activity contributing to food security and rural livelihoods.

2. Shellfish Aquaculture as a Compatible and Beneficial Use (policy 1.1 and 2.1.3)

The Draft Policy Statement emphasizes environmental protection and stewardship, including the objective to:

- “protect the Trust Area and its unique amenities and environment for the benefit of present and future generations.”

Shellfish aquaculture is uniquely compatible with many of the values the Islands Trust seeks to protect. Filter-feeding shellfish provide well-documented ecosystem services, including improvements to water quality, nutrient cycling, and habitat complexity. Properly sited and managed shellfish farms are low-impact, place-based, and non-extractive, and can coexist with recreational use, cultural values, and conservation objectives.

Policy language that implicitly frames shellfish aquaculture primarily as a potential source of conflict or impact risks overlooking these benefits. Explicit recognition of shellfish aquaculture as a compatible and beneficial use would better reflect current scientific understanding and support balanced decision-making.

3. Direction of Aquaculture Tenures and “Appropriate Locations” (policy 3.5.19)

The draft Policy Statement includes direction to:

- “direct commercial aquaculture tenures to appropriate locations that will not adversely impact areas of cultural, spiritual, archaeological, medicinal or recreational significance, or established or designated upland land uses, anchorages or moorages.”

While the intent of this policy is understood, the term “appropriate locations” is not defined and risks being interpreted in a manner that effectively excludes shellfish aquaculture from large portions of the Trust Area.

I recommend refining this language to ensure that location decisions are based on clear, science-based criteria and a balanced consideration of both potential impacts and benefits. Shellfish aquaculture should be assessed as a compatible use where evidence demonstrates that environmental, cultural, and recreational values can be maintained or enhanced through appropriate siting and management.

4. Ecosystem Protection, Precaution, and Cumulative Effects (policy 2.1.5 and 2.1.6)

The Draft Policy Statement emphasizes ecosystem protection, cumulative effects, and precaution, including commitments to:

- “apply the precautionary principle in decision-making,” and
- “consider cumulative effects in planning and land use decisions.”

These principles are supported. However, their application should explicitly recognize that shellfish aquaculture can function as a form of ecosystem stewardship, not solely as a potential stressor. Without this balance, precautionary and cumulative-effects language risks being applied in a one-directional manner that disadvantages shellfish aquaculture despite evidence of ecological benefit.

Incorporating recognition of shellfish aquaculture’s ecosystem services would support proportionate, evidence-based application of precaution while enabling adaptive management and continuous improvement.

5. Shoreline Buffers and Setbacks (policy 3.5.20)

The Draft Policy Statement directs that planning should:

- “consider the current and anticipated impacts of sea level rise and storm surge, and determine appropriate shoreline buffers and setbacks from the sea.”

Shoreline protection objectives are supported; however, blanket buffering approaches that do not account for the operational realities of shellfish aquaculture risk unintentionally constraining marine agricultural activity, even where environmental objectives are being met.

I encourage inclusion of language that allows for context-specific, science-based approaches to shoreline management that recognize shellfish aquaculture as a compatible use of nearshore environments.

6. Jurisdiction, Reconciliation, and Practical Viability

In implementing the Policy Statement, it is important that Islands Trust policies respect provincial and federal jurisdiction over aquaculture and avoid creating de facto regulatory barriers to a provincially and federally

regulated and recognized food culture activity. Policy language should support constructive engagement with provincial agencies rather than functioning as an indirect exclusion mechanism through cumulative constraints or undefined compatibility tests.

Many shellfish aquaculture operations within the Trust Area are developed in partnership with First Nations and contribute to Indigenous food sovereignty, stewardship, and local economic development. Policy approaches that effectively exclude shellfish aquaculture risk undermining reconciliation objectives and Nation-led marine planning initiatives.

Finally, policy support must extend beyond theoretical allowance to ensure practical and economic viability. A use that is technically permitted but constrained to the point of infeasibility is, in effect, prohibited. Clear, balanced policy direction is necessary to avoid unintended outcomes that conflict with the Trust's stated commitment to sustainable communities and environmental stewardship.

Closing

Overall, I encourage the Islands Trust to use this Policy Statement to clearly articulate that shellfish aquaculture, as a recognized agricultural activity, can contribute positively to the Trust's mandate. Explicit recognition and balanced policy treatment would help ensure that future planning and referral decisions are consistent, transparent, and aligned with provincial policy and contemporary environmental science.

Thank you for considering these comments.

Sincerely,

Nico Prins

Executive Director

BC Shellfish Growers Association