



October 19, 2021

David Marlor
Director – Local Planning Services
Islands Trust
Sent by email

Dear David:

Re: Comprehensive Update to the Islands Trust Policy Statement

Thank you for providing the opportunity for the Ministry of Agriculture, Food and Fisheries (Ministry) staff to comment on the comprehensive update to the Islands Trust Policy Statement. The Ministry appreciates the work that Islands Trust staff have invested in this project and from an agricultural perspective, Ministry staff offer the following comments:

4.3 Forest Stewardship Policies

Policies 4.3.3, 4.3.5 & 4.3.9: It is evident that Islands Trust is deeply committed to the stewardship of forest ecosystems within the Trust Area. However, Ministry staff note that these policies may have an adverse impact on agriculture. Land clearing (i.e. removing trees) is often a necessary farm practice for farmers to conduct agriculture. Whether farmers land clear an entire property or simply remove a small number of trees, land clearing is often necessary to commence an agricultural operation or to expand an existing one.

Further, section 6 of the Agricultural Land Reserve (ALR) Use Regulation, via the definition of “farm operation” in the *Farm Practices Protection (Right to Farm) Act*, identifies land clearing as a Farm Use that may not be prohibited by a local government if the work is required for Farm Use.

Ministry staff encourage Islands Trust to amend sections 4.3.3, 4.3.5 and 4.3.9 to reflect the ability of a farmer to clear their land for agricultural purposes. Amended wording for section 4.3.3., for example, could include the following addition in bold font:

*It is Trust Council's policy that forest harvesting in the Trust Area, **with the exception of properties in the ALR**, should be limited, small-scale, sustainable, regenerative, supportive of climate action, respectful of Indigenous harvesting areas, and protective of the environmental integrity of the Trust Area.*

4.4. Agricultural Land Stewardship Policies

Policies 4.4.2 & 4.4.3: Despite the holistic approach, these policies present some challenges from an agricultural perspective. Ideally, all agricultural activity throughout B.C., not only in the Trust Area, would be conducted using the guiding principles listed in policy 4.4.2. However, in reality agriculture is often conducted in a very different manner. For example, many farmers in B.C. spray pesticides on their crops to optimize crop yield and use gas/diesel powered machinery as part of their agricultural operation. These practices may not be viewed by some people as 'sustainable' or 'supportive of local climate action' but may be necessary for an individual agriculture operation.

Without providing additional clarification, this section is also somewhat ambiguous and could create confusion. For example, by identifying that all agricultural activity should be 'small-scale', it is ambiguous whether large-scale commercial farming operations would be supported. As written, these policies appear to stigmatize large-scale farmers who use conventional farm practices that may not be viewed by some people as 'sustainable'. Ministry staff recommend supporting farming unilaterally.

Overall, this section appears to strive for a vision of agriculture that does not reflect the current realities of the agricultural sector in B.C.

Policy 4.4.6: With respect to the following policy:

that farming in the Agricultural Land Reserve in the Trust Area does not adversely impact Indigenous food security and traditional harvesting practices, cultural heritage, or the environmental integrity of protected area networks in the Trust Area;

While Ministry staff recognize the importance of supporting First Nations food interests and traditional harvesting practices, staff are concerned that the above policy is not specific and therefore, applies to both Crown and privately owned land, including ALR land. As such, it appears to suggest that the Trust Council desires to pursue additional limitations/conditions on how farmers are able to farm their privately owned property.

As written, this statement implies that not only should private landowners avoid agricultural practices that adversely impact 'Indigenous food security and traditional harvesting practices', but simultaneously should farm their property without impacting the ability for First Nations to somehow conduct their traditional harvesting practices on that property. Ultimately, the Ministry is concerned with the ambiguous nature and intent of this policy.

With respect to the following policy:

that support is given to small-scale sustainable farmers to reduce greenhouse gas emissions emanating from agriculture and adapt to climate variability in the Trust Area;

This policy appears to exclude large-scale farmers who use conventional farm practices and who may equally benefit from support to reduce greenhouse gas emissions and adapt to climate variability in the Trust Area. There is no description of what differentiates “small-scale” from “medium-scale” and “large-scale”. This becomes a purely subjective matter.

4.5 Soil and Mineral Stewardship Policies

Policies 4.5.1 & 4.5.5: Given the critical role that soils often play in contributing to successful agricultural operations, Ministry staff are pleased to see the addition of these two policies.

4.6 Coastal and Marine Stewardship Policies

Policy 4.6.2: Similar to policy 4.4.2 above, Ministry staff are similarly concerned with the challenges that this policy appears to impose on the aquaculture industry.

6.2 Housing Policies

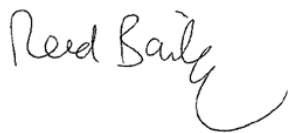
Policy 6.2.6: In an effort to minimize the impact of residential development/housing on agricultural lands, Ministry staff suggest adding the below noted wording in bold font:

*Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, identify appropriate floor area and lot coverage limits for residential development in their planning area, in order to effectively minimize greenhouse gas emissions, cumulative effects, biodiversity loss, climate vulnerability, **impacts on agricultural land** and destruction of Indigenous cultural heritage.*

Ministry staff would welcome the opportunity to discuss our comments further and are available to provide additional input and support.

Thank you for the opportunity to provide comments from an agricultural perspective with respect to the Islands Trust Policy Statement.

Sincerely,



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