



November 21, 2025

Jason Youmans
Senior Policy Advisor
Islands Trust

Sent by Email

Dear Jason:

Re: Third Referral – Revised Update to the Islands Trust Policy Statement

Thank you for providing the opportunity for Ministry of Agriculture and Food (Ministry) staff to comment on the revised update to the Islands Trust Policy Statement (the Statement).

Ministry staff initially provided comments on the Statement on October 19, 2021, and subsequently responded to a second referral on September 5, 2023, following significant revisions to the Statement stemming from the first external referral.

Directive Policy 3.4.2

In addition to minimizing the fragmentation of forested lands, Islands Trust is encouraged to also recognize that fragmenting agricultural lands is detrimental to the long-term success of the industry. A suggested addition is highlighted in **bold** below:

*Manage community growth and its associated impacts by directing residential, commercial and industrial development into suitable locations, to prevent sprawl, minimize fragmentation of forest **and agricultural** lands, and avoid adverse impacts to Indigenous cultural heritage, harvesting and hunting areas.*

Directive Policy 3.5.11

Ministry staff note that the third iteration of the Statement is similar to the second iteration and that minimal changes were made to the Policies that apply to Agricultural Lands. One notable change is to Directive Policy 3.5.11 (previously numbered as 3.5.9 in the second iteration) that now only identifies and protects agricultural lands “within the Agricultural Land Reserve” (ALR). Previously, this policy identified and protected all agricultural lands; irrespective of whether they were located in the ALR.

Ministry staff note that a significant number of smaller agricultural operations occur on properties outside of the ALR and that collectively, they make a meaningful contribution to both the food security and economic output throughout the Islands Trust area. Given this, Ministry staff encourage Islands Trust to revert the wording of Directive Policy 3.5.11 to the previous wording from the second iteration of the Statement.

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

Sincerely,



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